Guildford borough Submission
Local Plan: strategy and sites

Regulation 19 consultation representations (ordered by Local Plan policy or section)

December 2017

Document 2 of 12

Sections covered
Policy H1: Homes for all
Policy H2: Affordable Homes
Policy H3: Rural Exception Homes
Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value
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Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy H1 - Homes for all
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18096</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

Policy H1: Homes for all

4.2.1 We question the wisdom of adding you want to meet “demand”. For example, there has been demand by foreign investors for homes to be bought as an investment and left vacant.

“Development that results in the net loss of housing or specialist housing, including sites allocated for housing within the Local Plan will not be permitted.”

This should be qualified with “normally”. It will be necessary to be able to make adjustments to the number of homes given permission “in principle” or in outline where a site survey shows that the envisaged number of units cannot be accommodated without causing unacceptable impact (eg space is needed for sustainable drainage). Also, within the context that some town centre properties are changing from business to residential, it may be appropriate to make some changes from residential to business. In some instances, it may not be inappropriate for a house in multiple-occupation to be reinstated as a family home.

Density- Policy and Justification

We strongly welcome this approach with an overall presumption and decisions taken on what is appropriate on a case by case basis. This has been a game changer in enabling positive schemes in Guildford. Previous targets were too blunt to be useful having no relevance where higher densities could be achieved and driving harmful schemes and avoidable appeals in those instances where a lower density was appropriate.

Students

“We expect 60 per cent of the University of Surrey eligible student population (full time equivalent) to be provided with student bedspaces and accommodation on campus.”

This percentage is far too low given the mix of pressures on Guildford as a university, London commuter belt and constrained gap town. We have a thriving University that is an engine for our economy and also for population growth. With that comes responsibility. We ask the University to provide far more campus accommodation making it attractive so 80-90% of their students will want, and expect, to live on campus. This will free up much needed affordable homes in the town. (See comments on Soundness and Annex 3)

Object: seek changes and inadequate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Net Loss - We oppose the proposed changes to H1 (2) as too inflexible. Exceptional circumstances will arise.

Density - We oppose the deletion of the section on density although we considered the last sentence on the town centre to be superfluous. We consider this section worked well as part of a policy that also looks at the range of types of home needed. The approach of an overall presumption in favour of efficient use of land and decisions taken on what is appropriate on a case by case basis has been very helpful locally in enabling positive schemes in Guildford. Previous targets were too blunt to be useful having no relevance where higher densities could be achieved and driving harmful schemes and avoidable appeals in those instances where a lower density was appropriate.

Student Accommodation – We oppose the proposal that only 60% of “full time Guildford based” students should be on campus rather than of all students. In practice, this means far fewer than 60% which is already far too low given the challenges of identifying acceptable sites in Guildford. Change in this policy to at least 80% on campus would make a significant difference to affordable housing availability for others in the town and could transform Guildford’s ability to meet its housing need in the first five years.

Paragraph 4.2.3 This break down cannot be ‘known from the SHMA’ given the demographic and economic need errors.

Paragraph 4.2.8 We oppose deletion of this text which enables developers to appreciate the links between housing type and density when identifying an appropriate mix for a site. It supplements the NPPF well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We have enough good family homes in Guildford for our population. Unfortunately many of these are used by students who could be housed on campus. Why haven’t you raised the target for this? Whole areas of Guildford are blighted by use of family houses for student lets.

Your proposal for 12,426 homes (plus a buffer of 1,555 homes) is excessive. We will lose green belt. The character of Guildford will alter for the worse. Those of us who live here will have increased pollution, noise and congestion while the pressure on amenities, health care and education - already severe - will reach breaking point.

Lastly, what is the point of costly window dressing consultations if you take no notice of the responses?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11406  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Para 4.2.8.

A commitment is needed to set (in the following SPDs) guideline **maximum dwelling densities** for all areas, together with identification of those areas, such as Charlottesville, where no increase in dwelling numbers will be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3340  Respondent: 8560257 / Patricia Camp  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Guildford Borough Planning Policy**

I write to strongly object to the Guildford Borough Draft Local Plan to remove the village of West Horsley/East Horsley from the Green Belt as follows.

No sound case is made justifying changing Green Belt boundaries laid down many years ago by national legislation.

The main purpose of Green belt is to keep a sense of openness between built up areas, in this case around London. The Green Belt also provides opportunities for people to access the country to keep land for agriculture, forestry, and similar land uses, and for nature conservation.

It would be totally irresponsible for the council in that removing the Green Belt would totally destroy it now and for future generations.

**Housing**
I strongly object to the number of proposed houses, 485, for the Horsley’s’ the large number of homes would be totally out of character with the existing character and layout of the village.

The village settlement is comprised of low density housing with a considerable mix of ages and housing styles.

West Horsley does require some affordable housing for young people.

Affordable housing for elderly residents to be near the village facilities as many would be unable to walk a great distance to the medical centre, chemist, shops, library or transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1788  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

bb) In Policy H1, the reference to Density has been removed. There always was a difficulty with the general wording provided but the remedy should have been more qualitative and should have avoided a potential battle with developers to respect existing fabric and structures in our built environment –this will inevitably be unsatisfactory unless or until the Development Management Local Plan is brought forward and adopted.

c) We support the inclusion of Accessible Homes (H1(3)) but it should be noted that some of our topography may make sites less well suited to providing accessible homes, in which case there should be some provision for commuted sums to enable other homes to be adapted.

d) We broadly agree the policy in respect of Student Accommodation (H1(5)) but note that not all further education establishments are in a position to comply with this policy, and there will need to be some pragmatism required to implement it fairly and reasonably. We accept the 60% threshold as a starting point but note there are no policies in the plan to prevent students from renting homes off campus in the local property markets.

e) We note the inclusion a policy for self-build homes and we broadly welcome this policy.

ff) We note the definition of active and comprehensive marketing at Appendix A2 and recognise it is broadly in accordance with market practice.

gg) Paragraph 4.2.3 refers to the SHMA Addendum Report 2017 –we have commented about that elsewhere in this document.

hh) Paragraph 4.2.18 contains a reference to windfall sites for student accommodation. Windfall sites will also contribute to meeting general housing need and the local plan should take account of this.

ii) The requirement at 4.2.27c for ‘the delivery of a significant proportion of self-build or custom build plots [to be] expected within the first phase of development’ may need to be rethought due to potential conflicts of viability (leading to a slower and perhaps lower provision of Affordable Housing) and delivery (especially where developer funded infrastructure may also be front-loaded). Early delivery may also result in self-builders being required to sign up to s106 and CIL obligations in planning agree.
HOUSING DELIVERY - TOPIC PAPER (2017)

The Guildford Society recognises the need to increase our housing stock. This is particularly the case for down-sizers, first-time-buyers and those needing affordable homes (see comments to separate topic paper). We also fail to comprehend and agree with the obscure and obtuse GL Hearn Strategic Housing Market Assessment and subsequent amendments. We have attached to our response a copy of the report carried out by Neil MacDonald (Annex 2) on behalf of the Guildford Residents Associations (GRA). This fundamental disagreement notwithstanding, we recognise that Guildford Borough Council has settled on a housing target of 654 homes per year. We have made our site-specific comments in response to this and earlier iterations of the plan and do not propose to repeat these here. We do believe the approach outlined in this document, and the local plan itself, demonstrates a signal lack of planning in the town centre which could (as the Guildford Vision Group has shown) accommodate substantially more dwellings than the local plan suggests. We are concerned by the figures in sections 4.190 to 4.193.

The proposed housing trajectory must surely be a mathematical error. It places the local plan and the Borough at great risk from aggressive developers – not least Solum seizing on it as an opportunity to press for reversal of the planning refusal on appeal due to a monumental shortfall in five-year housing supply against the target of 654 homes per year. On the whole, we understand the approach taken by Guildford Borough Council to phase development contingent upon infrastructure and of allocation of sites (notwithstanding our concerns about the relatively small numbers of housing units planned for the town centre).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6168  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all

We object to this policy.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the Plan period. It fails to set rules on important issues such as constraints and density and is not specific enough to provide a practical framework for planning decisions.

A much higher proportion of Surrey University students should be housed in university accommodation. The University has proved to be recalcitrant in providing accommodation in spite of outstanding Planning permissions. The policy does not do enough to rectify this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17423  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**H1 – Homes for All**

Report page: 9

WHPC view: Supports

In brief: Achievability is queried

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/17451  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:***

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY H1: Homes for all**

WHPC supports the general policy statements made in this policy, which mainly repeat NPPF polices. Our primary concerns, as set out above, are with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)

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**Comment ID: pslp171/2337  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:***

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

<table>
<thead>
<tr>
<th>Policy No. and title</th>
<th>2016 WHPC position</th>
<th>2016 WHPC comment in brief</th>
<th>2017 WHPC position</th>
<th>2017 WHPC comment in brief</th>
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</thead>
<tbody>
<tr>
<td>H1 – Homes for All</td>
<td>Supports</td>
<td>Achievability is queried</td>
<td>SUPPORTS</td>
<td>Achievability still queried. The paragraphs on Density in Policy H1 have been deleted. To ensure developments make optimal use of space a policy to cover minimum and maximum densities is required</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Housing Target

Setting a housing target for Guildford Borough is a vital function for the Local Plan. The Trust is reluctant to get involved in the method of reaching a figure for an adjoining borough but, given what is at stake locally, considers that it has an obligation to comment and object to the figure put forward.

Paragraph 158 of the NPPF 158 provides that "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence". The starting point for that is a Strategic Housing Market Assessment (SHMA).

The SHMA does not take into account any of the constraints to development such as Green Belt, AONB, woodland, heathland, protection of flora and fauna etc. in determining an “Objectively Assessed Needs” (OAN) figure for the Local Plan. It is for the local authority to take these constraints into consideration and apply them to what is provided in the SHMA.

There has been nationwide concern, especially from local residents and community groups, even about the figures emerging from the SHMA process. In many instances the figures are considered to be inflated or otherwise inaccurate. Such inflation can occur in the hands of consultants who are inclined to favour developers. Guildford Borough Council have used G.L.Hearn as consultants and that company’s website shows that their work for developers could provide motive for bias. Local authorities can succumb to those in the planning industry acting on behalf of developers who advocate that the “presumption in favour of sustainable development” means that growth must be looked for across the board and in doing so have less regard to where there should be constraints. If local authorities overlook proper scrutiny it can also be because that development can generate income from Community Infrastructure Levy, taxes and bonuses.

For the purpose of a Local Plan it is necessary to have underlying data that is used to back up propositions. In the case of the West Surrey Housing Market Area (SHMA) for Guildford, Woking and Waverley, and prepared by G L Hearn, requests for that have met with resistance. Incredibly Guildford appear to have told the Information Commissioner that consultants have refused to give it the formulae and assumptions in the model because of ‘intellectual property’ in the model used. The Trust understands that in consequence neither the administrators nor councillors at Guildford Borough Council have had an opportunity of scrutinising vital basic information. This makes it all the more important that Inspectors test SHMAs and OANs against properly provided methodology.

The Trust understands that the process toward determining targets for future housing numbers starts with the Office for National Statistics (ONS) projection of the likely local population change for the borough due to natural change (births, deaths), net internal migration within the UK and finally net international migration.

The Trust understands that based on natural change and net internal migration recent ONS data projected that the borough population to 2031 would shrink and that it would increase only on projected net international migration based upon the abnormally high increase in the number of foreign students attending the University of Surrey (as was experienced in recent years). The ONS themselves state that this latter figure is less reliable and anyway stress that before its projections are turned into predictions their basic statistics should be reviewed in detail, with changes made based on whatever factors are deemed important in that review.

G L Hearn have assessed the housing need for Guildford at 693 dwellings per year, (13,860 overall) for the next 15 years (the result bring to add 25 per cent to the stock of dwellings in the borough with increased pressure on existing
infrastructure. It is based predominantly on international migration, itself based on an increase in students. Even if desirable this is implausible particularly in a post-Referendum climate with further education being more expensive in the UK compared with other countries, evidence this week of students no longer wishing to study in the UK and a trend to distance learning. This issue should also be considered in the type of housing required. If based on any realistic forecast the University, with unused planning permissions for student accommodation on campus, should take responsibility to enable this factor to be removed from the equation for projected household numbers. This would free up affordable housing for local people, particularly the young. In any event, a separate detailed assessment should be made of the need for and type of student housing required.

This aspect of the SHMA reveals that the basis for it is severely flawed.

There is also a need in looking at housing targets to distinguish between need and demand. The latter could be limitless as in Guildford house prices and therefore demand are dictated and dominated by London house prices. The outward movement of population from metropolitan London is incapable of being satiated and was an important reason for the creation of the Green Belt.

In looking at the OAN there would appear to be insufficient evidence of the residences that Guildford town can accommodate (windfalls, reuse of empty housing, switch from office accommodation and use of student accommodation). A substantially lower number would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Additional observations

The Trust makes the following general observations on the draft Local Plan.

Policy S1 should go in full through the principles for sustainable development in the NPPF in full including the 12 Core Planning Principles set out in paragraph 17.

Evidence on infrastructure

The draft Local Plan seems to have again been assembled with insufficient proposals or research on the infrastructure needed to accompany proposals for housing development. There must be proper infrastructure planning for transport, educational, medical, energy, water and communications services before additional housing is contemplated. It does not seem to be understood that, for instance, bus transport is wanting and there are few facilities in the borough for any transport to rural parts except by car. There is no guarantee that the A3 will be improved in the way suggested.

Urban Development

The Trust supports higher density development in the urban area where there is existing infrastructure, although that should of course avoid over intensification. Guidelines should avoid spoiling the environment and causing congestion but much can embrace fresh thinking on urban life including pedestrianisation, cycling lanes, home zones and underground parking.

Affordable homes and homes for those on low income and the young

Market prices in the South-East mean that homes designated as affordable are just not that. That makes it even more important that developers are given no leeway from the requirements to provide a proportion of a development to be built as such. In this area there is no excuse to plead viability as a reason not to comply with guidelines. The Trust is keen that in the North Surrey area Local Plans should be formulated in a way that will provide accommodation for local people, to the young and those on low pay and that a good stock of starter homes and social housing are made available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **I OBJECT** (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford Borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy H1 Homes for All
References to density of development have been removed

I strongly object to the removal of density frameworks. This is especially valid where land is being taken out of Greenbelt, but must equally apply to ensure precious land and space is optimized. Density recommendations are normal practice and it is of great concern to see these being removed from policy.

Policy H1 Homes for All
Accessible Homes

I support the inclusion of wheel chair accessible housing and view this along with 4.2.4 with respect to percentage need.

Policy H1 Homes for All
Accessible Homes

I can see no benefit to the change. Both phrases are equally 'wooly'.

4) We will support The provision of well designed specialist forms of accommodation in appropriate sustainable locations is encouraged, taking into account local housing needs.

5) Purpose built student accommodation for full time higher education Guildford based students will be encouraged on campus locations where appropriate. We expect About 60 per cent of full time Guildford based University of Surrey students are expected to be provided with accommodation on campus.

This statement has no teeth. GBC is in a strong position as the University wishes to remove land bequeathed to it from greenbelt and hence plans to accommodate a minimum of 60% of students from the University on Manor Farm MUST be submitted before any planning approval is given to remove more Greenbelt.

4.2.6

This does not go far enough. The policy accepts that most people will fit into general housing need but categorises, students, travelers, nursing and residential care homes as having different due to omission.
requirements. Elderly in general have different needs and this plan is a long way off providing for these needs.

Elderly frequently need to downsize but need likeminded people round them, in a supportive environment with amenities close by.

<table>
<thead>
<tr>
<th>4.2.8</th>
<th>I strongly object to the removal of advisory notes and need for density.</th>
<th>Object</th>
</tr>
</thead>
<tbody>
<tr>
<td>removal of density policy</td>
<td>I object to the removal of policy that protects the needs of elderly in favour of 'general' housing as the needs of older people will not necessarily fit this mould. General housing with wheelchair access is to be applauded, especially for disabled people who are not elderly. Retirement villages work well for elderly and these appear to be missing from the plan? Various models are in place and given the pressure there will be on places in care homes, these facilities should be encouraged.</td>
<td>Object</td>
</tr>
<tr>
<td>4.2.11</td>
<td>Addition of integrating technology in new homes can assist with telecare and telemedicine facilities.</td>
<td>Strongly support this technology</td>
</tr>
<tr>
<td>4.2.15</td>
<td>Should include sheltered housing.</td>
<td>Comment</td>
</tr>
<tr>
<td>4.2.16</td>
<td>Is a statement rather than guidance or policy? Some students rent private accommodation (not necessarily shared and parents of some student parents purchase a flat on behalf of their child, which they then rent out once their child's course has ended.</td>
<td>Comment</td>
</tr>
<tr>
<td>4.2.18 /19</td>
<td>The University must take responsibility for housing students. The recommended 60% must be the minimum number and this needs to be monitored.</td>
<td>Comment</td>
</tr>
<tr>
<td>4.2.21</td>
<td>Offers no idea as to what a small scale traveler site equates to? The figure of 9 pitches has been removed? Some indication is needed.</td>
<td>Object due to omission</td>
</tr>
</tbody>
</table>
4.2.25

In London and surrounding areas many young professionals live in HMO's and some get onto the housing ladder by joint purchase. Flat sharing can be a positive experience and when it is responsible adults, need not have an adverse impact on the neighbourhood.

I am not sure why the NPPF has been removed as part of the evidence base?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/180  Respondent: 8571617 / Gordon & Jane Farquharson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Plans to expand Guildford by 20 to 25% appear to be based on an error.

Compelling evidence by a respected national expert, who worked for the Government, shows Guildford has greatly over-estimated its population growth.

This means we do not need to sacrifice so much Green Belt or to allow town cramming.

If the Council persists in releasing so much Green Belt for development, we will be asked to provide for Woking’s unmet housing needs – sacrificing our Green Belt to protect Woking’s!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/187  Respondent: 8571617 / Gordon & Jane Farquharson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13034  Respondent: 8573793 / Harry Eve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
53. Student accommodation in town has damaged the provision of “Homes for all”. A much higher level of student accommodation should be on campus.

54. While the policy requires that density should “respond” to local character, context and distinctiveness, this is not being adhered to in certain proposed site allocations in villages (example – site A36 (Hotel, Guildford Road, East Horsley) where the proposed density is exceptionally high in relation to the locality).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1672  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The section on density has been removed and a reduced statement placed in Policy D4. The point that higher density development will be supported in the town centre has been lost in the process as has the explanation in 4.2.8. These points should appear in the Policies and I object to this change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5949  Respondent: 8575585 / Ian Macpherson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1: Homes for all

While homes for all is a worthy objective, it would be better if it were established in the context of the sub-region. Guildford, because of its inherent attractiveness and the quality of the countryside, can conveniently establish itself as a provider of high and very high value homes. The sub-regional housing market indicators suggest that Aldershot and places west such as Alton are already providing market affordable homes for the sub-region. A step towards this is indicated elsewhere in the draft by promised improvement of the rail service from Alton and from Farnborough to Guildford. This is not explored at all, due to arbitrary limitations to the SHMA Housing Market area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6977  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

<table>
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<tr>
<td>H1 Housing– Homes for all Support</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/17327  Respondent: 8579649 / Home Builders Federation (Mr James Stevens)  Agent:</th>
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<tr>
<td>Traveller accommodation</td>
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<td>The Council must provide for the needs of the traveller community. To ensure that the needs of the traveller community can be met, we would question why this policy is proposed for development sites of 500 units and upwards and why the provision of traveller pitches should be allowed on smaller schemes. We note the wording to Policy H3: Rural exception homes. This allows for traveller pitches on rural exception sites but the wording in Policy H1 would appear to contradict this policy.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: PSLPP16/18719  Respondent: 8581089 / Jenny Wicks  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Policy H1</td>
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<tr>
<td>I object to this policy</td>
</tr>
<tr>
<td>Students occupy a significant amount of accommodation which could be used by others. 60% of students on campus is too low an aspiration, especially in view of the slow pace of building out existing planning permissions for student accommodation. GBC should look at policies in for example Oxford, which relate expansion of student numbers to delivery of new student accommodation.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/17548  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:</th>
</tr>
</thead>
</table>
This policy is misguided in that expecting one place of education (University of Surrey) to provide 60% of its own accommodation while failing to require a similar proportion for the other degree level education establishments in the town. It promotes segregation of students from town life and no one can be ‘forced’ to live anywhere. Even if 100% of accommodation were provided on campus there will always be students who do not wish to live there! The student problem needs to be revisited. The policy should require all education establishments to provide affordable (low cost) accommodation for all non-local students such that during their educational period they do not automatically by default ‘absorb’ local housing stock.

This section of the policy is unsound

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.2.1
Student accommodation; university students cannot be forced to live on site’ noting the university is not the only education centre in Guildford, [e.g. There is The University of Law, and the Academy of Contemporary Music.] The university should not be singled out in this policy (sub section 5) Student accommodation should be re-worded “Educational centres with students from outside the Borough and requiring student accommodation should provide at least 60% on site or in purpose built units”

4.2.3
The addendum to the SHMA did not comply with central government guidance concerning openness of calculations and raw data. The exact raw data and formulae used have been claimed to be commercially confidential, contrary to open government principles. Statistical analysis by bodies other than GBC suggest that the raw data used and the resulting calculations are not comparable with other similar SHMA exercises across the country, suggesting that the housing number is considerably higher than is statistically rational or mathematically correct.

4.2.4
The requirement of 15% to meet M4 Standards is commendable but this needs re-wording so that the 15% is across the borough. If less than 7 homes on any one site were proposed, it is unclear how the 15% would be captured. It would be better worded as “15% of all planned/completed new homes in the Borough in any one year must be M4 compliant.”

4.2.16
Student accommodation: Guildford College has more students on the books (distance learning) and more students will be living at Guildford College following a recent planning application for student accommodation on site. Perhaps re-wording would better explain the student overnight accommodation needs.
The total of student accommodation should logically be removed from the SHMA and treated as a separate calculation and separate need [Similar to how a hotel chain would calculate need in a location]. Only the final number should be translated into policy as ‘beds needed’ across the Borough. The separation should be clearly shown in any calculation. This is because the type and style of accommodation, and nature of occupation, are different than for family homes. The requirement for student beds is ‘yearly’ or even ‘seasonal’. They are not permanent Borough residents across the life of the Plan (20 years). As many as 60 students could be sleeping in the same ‘bed space’ over 20 years if they are attending one term per year, thus numbers for students cannot be aligned with their lecturers who could occupy the same bed space for the full 20 years. A statistical error of 60% plus could be introduced if the calculations are incorrect and remain unchecked by an independent auditor.

Page 41 Key Evidence.
- SHMA Guildford addendum report 2017-06-17
- Land availability assessment GBC 2016
Both of these documents have been developed outside the envelope of public scrutiny due to claims of commercial confidentiality, thus raw data and formulae used in their preparation have not been open to scrutiny. This totally contradicts the Council’s own executive statement of openness and the principles of open government. The Council acknowledges its duty to cooperate; however while preparing the Local Plan at no stage has the LPA communicated with the Burpham Neighbourhood Forum in respect of their intentions within the ward of Burpham, seriously undermining the purposes and spirit of neighbourhood planning. This is a flagship government initiative. In paragraph 2.13 of their topic paper on their Duty to Cooperate, neighbourhood planning groups do not fall within the Council’s interpretation of groups with whom it should cooperate, while the DCLG take a different approach and state “Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body. This could include sharing evidence and seeking to resolve any issues to ensure the draft Neighbourhood plan has the greatest chance of success at independent examination” [https://www.gov.uk/guidance/neighbourhood-planning-2 Paragraph: 009 Reference ID: 41-009-2016021111]

GBC has failed to share the SHMA evidence (raw data and formulae) with the Neighbourhood Forum and thus failed in both their duty to cooperate and show the openness requirement of the process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey
University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13514  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Policy H1: Homes for all**

The condition of 60% of students at the University of Surrey living on campus in the 2003 Local Plan has not been met. If used efficiently, land could be used to house a larger number of students on campus, which would ‘free up’ houses for families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Density**

The deleted paragraph regarding density should be re-instated. Density should be flexible and defined by Local Authorities who know the density which is suitable in a particular area taking into account local character and distinctiveness.

I object to the paragraph regarding density being deleted in Policy H1

**Student Accommodation**

(5) 2nd sentence: The word ‘about’ weakens this sentence and makes it less likely that 60% of eligible students will be provided with accommodation on campus. A larger requirement for 80% student accommodation on the University of Surrey campus would free up more homes for families which are at present occupied by students. The campus is also taken up with large areas of surface car parks, land which could be used more efficiently.

I object to the word ‘about’ and the lack of a stronger policy regarding student accommodation provided on campus in Policy H1 (5)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1487  Respondent: 8586785 / Elizabeth Critchfield  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

I am concerned that the DLP only requires 60% of full time University students to be housed on campus. Surrey University could easily meet a more realistic target of 80% by using its existing planning permissions which would free up more affordable homes in the town. I object to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8574  Respondent: 8586977 / Ms Loraine Austin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

I disagree with the proposal of many traveller pitches in Guildford [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1555</th>
<th><strong>Respondent:</strong> 8587073 / Rushmoor Borough Council (Louise Piper)</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> <em>(Yes)</em>, <strong>is Sound?</strong> <em>(Yes)</em>, <strong>is Legally Compliant?</strong> <em>(Yes)</em></td>
</tr>
</tbody>
</table>

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.

The suite of policies use to support the determination of proposals for residential development and associated infrastructure, including Policy H1, is supported.

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.

In terms of meeting this need, 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 Sendmarsh 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. Rushmoor is supportive of the policy approach to planning for travellers as set out in the draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attatched documents:

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<tr>
<th>Comment ID: PSLPP16/8069</th>
<th><strong>Respondent:</strong> 8587489 / University of Surrey (Malcolm Parry)</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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**Housing Policies:** Policy H1 “Homes for all” suffers from the inclusion of an unacceptable requirement to impose on the University (regardless of Blackwell Farm) an obligation to provide accommodation for 60% of its students on campus. This imposition will limit education and will create a “them and us” style society. The housing problem in Guildford is not caused by students or the University and the Town should not discriminate against them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attatched documents:

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<tr>
<th>Comment ID: PSLPP16/10227</th>
<th><strong>Respondent:</strong> 8589345 / Ms Mary Symes</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong></td>
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May I suggest a solution? Many people like to downsize as they get older to apartments with lifts, views and with shops and transport within easy reach. Some nice three storey apartments would be good. Then the houses would be freed up for people with families to move into. Please do not cover the Horsleys in concrete. You must know yourselves the damage that will be done to the environment. Let us guard what we have in our rural, lovely part of England. How about four stories in Guildford as well, so that we can keep our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to GBC withholding from residents their consultant’s and sub-consultant’s calculations of housing need, which is what is driving this whole issue. It would appear that even some individual councillors are not privy to the calculations or how the total has been reached but are blindly accepting a figure produced without workings or explanation. There are strong grounds for believing that GBC, aided and abetted by their consultants, have overstated by a wide margin what the figure should be. There are also grounds for believing that the numbers have been exaggerated as a result of pressure from developers. As the grabbing of Green Belt land is predicated on the need for a particular number of houses, a good starting point would have been to get the number right and to show transparently how it was reached.

Other submissions will provide supporting statistics and there are authoritative figures online to show the escalation of housing need in Guildford Borough has been about 0.5% per year for the last ten years. The draft plan provides no proper data which proves that it is increasing significantly more at the moment or that in future years it will rise by so much more. Guildford’s projected number in the last draft local plan was challenged by the Office of National Statistics which is a more reliable source since it is not driven by developers. Since the current set of figures was published other underlying data has changed; for example it was too late to take into account the effects on housing demand of changes to the population which could arise from Brexit. Nor has GBC applied the normal constraints to their maximum projections. For a proper professional assessment of housing numbers I refer the reader to the submission from Andrew Procter on behalf of the Save Send Action group.

I OBJECT to the combined total of 2000 (Wisley) + 485 (Send) + 2000 (Gosden Hill) + 1850 (Blackwell Farm) houses all alongside a short stretch of the A3 between the M25 and the university. To concentrate 6335 of the borough’s assessed need for housing of 13860, that is close to half of it, in such a small area of the borough is by any standards unreasonable. If GBC wants to build this number of houses, which has more to do with developer pressure than properly calculated need, it should spread them more evenly throughout the borough, which it is manifestly failing to do. This would help to alleviate excessive traffic congestion and pollution which is a certain consequence of GBC’s current proposals.

Applied specifically to Send, although it is the largest village in the borough it should not have to take a significantly higher proportion of new houses than the borough overall. It should also not have to take a significantly higher proportion of new houses on account of its current size which arises as a result of a disproportionate volume of housing previously being located in Send, Send Marsh and Burnt Common. When the Wimpy Estate of several hundred houses (Linden
Road, Maple Road and all adjacent “tree” roads) was built in Send some 40 or more years ago it represented a massive increase in the size of Send Marsh which increase at the time was disproportionate to the size of the village and its amenities. A further massive increase now, which relates numbers proposed to numbers existing, compounds the offence. It would be more equitable to say that as Send accepted a very large number previously, it should not be expected to do so again.

The housing number calculations also have to take into account the constraints, in particular those resulting from the Green Belt. I therefore repeat the points made in paragraph 11 above which cannot be over emphasised. The NPPF states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework” .The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/17181</th>
<th>Respondent: 8591329 / The House of Commons (Anne Milton MP)</th>
<th>Agent:</th>
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Specialist accommodation is of particular concern specifically the need for accommodation for adults with learning difficulties and special needs. Close working with Surrey County Council is essential to make sure that opportunities are found to bring specialist housing back into the county.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Accessibility – Policy H1 states 10% but at 4.2.4 and 4.2.10 the figure is 15% - higher is better for people with disabilities, but figure needs to be consistent to be effective.

Local residents, particularly in areas close to the University, continue to raise concerns about the need for more on-campus accommodation and pressures on the HMO and other rented property market in the town.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/23  **Respondent:** 8593185 / Niels Laub  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Students:**

The University first undertook to achieve a 60% target in 2003 (Manor Farm Master Plan (2003), Section 5.2) when it lobbied to have Manor Farm released from the Green Belt and has so far failed to achieve it, and so monitoring of their performance is crucial.

It is particularly of concern that the University has consent for campus accommodation that has not been built and that it developed the veterinary school on the site of a proposed accommodation block which could have been sited elsewhere. Over 7,500 university students are estimated to live in private rented homes within the town and this is likely to increase with the opening of a medical, veterinary and business school. This represents a large number of more affordable homes that could potentially be made available to the wider community if the university had more accommodation on their own campus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/12100  **Respondent:** 8594177 / Michael Conoley Associates (Michael Conoley)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy H1: Homes for all**

It is agreed that new residential development should make the most efficient use of land whilst responding to local character, context and distinctiveness. This said; some existing housing areas in the borough were developed at a time when there were not the constraints on available land that exist today and as a result are low in density. To limit the impact on the countryside and reduce future incursion into the Green Belt, developers should be encouraged to increase density where this will not impact on the character of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11855  **Respondent:** 8595649 / Paul Kassell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
There is insufficient allocation of social housing for key workers

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15579  **Respondent:** 8597793 / Pirbright Parish Council (Lindsay Graham)  **Agent:**

<table>
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<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</th>
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**Policy H1 Homes for All**

**Pirbright**

We would support the proposed identification of Pirbright as a village that remains washed over by Green Belt on the Proposals Map. The open and linear nature of the village, centred around the junction of a number of roads at the heart of which is the village green and associated community facilities, forms an essentially open character much of which is also designated as a conservation area. As such, it lacks the required scale and form to support development and is also constrained by the SPA/SAC heathland. These factors are important in maintaining the character and quality of the village.

As such we would also support policies that are proposed to protect the character and quality of the Borough including policies P2 Green Belt, P3 Countryside, P4 Flood Risk, P5 Thames Basin Heaths and D3 Historic Environment.

**The Pirbright Institute**

We are concerned at the proposed boundary of the Pirbright Institute and its insetting from the Green Belt. While we have for many years supported the work undertaken at the institute, it has to be recognised that this is a site that is surrounded by Green Belt and exists within the main core of Green Belt within Guildford Borough. It is not on the margins of the Green Belt or on the edge of a town where it might be appropriate to remove the site from the Green Belt in terms of the form or function of the surrounding land. The Green Belt in this location is essential in providing the setting of the historic village of Pirbright and is on one of the key approaches to the south of the village, between Pirbright and the conservation area in Worplesdon. As such the Green Belt serves to protect the countryside from encroachment, preserve the historic setting of settlements and is important in the separation of villages. The campus style of the existing site keeps the overall impact of the Institute within the character of the wider area. Any intensification that altered this character, which would be likely to follow its release from the Green Belt, would threaten this low density, campus character.

The countryside forming part of the Green Belt in this location is key to the understanding of the matrix of woodland, heathland and open land forming a key part of the character of the area. The site is also visible from its surrounding context and has the potential to have an impact on the Green Belt well beyond its boundaries, including from elevated views within the nearby Commons, including Hangman’s Hill. It is vital that this impact on the wider Green Belt around the site is not prejudiced by more intensive development that might result if the site were removed from the Green Belt and such controls were relaxed. The only basis on which the development of the Institute has been permitted in recent years is as a result of the very special circumstances that have applied that have justified the redevelopment or replacement of buildings at the site. It is important that its primary importance as an international research institute is retained as its principal rationale for development at the site.

If the site is removed from the Green Belt there is nothing to retain its special importance as a research institute and its campus style character and appearance, which in turn limits its impact on the Green Belt and on perceptions of urbanisation of the countryside and setting of the Thames Basin Heaths and villages such as Pirbright.
We therefore, request that the Institute is retained as being an important part of the Green Belt in this location.

Pirbright Parish Council also consequentially, objects to paragraph 4.3.14 of the Local Plan as proposed which incorrectly in our view, concludes that sites that are previously developed within the Green Belt should be excluded from the Green Belt and inset. This is not a logical or necessary interpretation of Government Policy. Several of the sites identified including the Pirbright Institute, are defined in terms of their character by their presence within the Green Belt - they should be treated as previously developed land within the Green Belt under the terms of paragraph 89. As such, importantly, development may be appropriate provided it would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

The Green Belt boundary should not be used simply to exclude any area of previously developed land for these reasons, policy already allows for their redevelopment if it is consistent with the maintenance of the Green Belt function. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans that set the framework for Green Belt and settlement policy and deliver sustainable patterns of development. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. The insetting of the proposed sites is inconsistent with these aims and the maintenance of the character and purposes of including the surrounding areas within the Green Belt and pays no regard to the impact of future intensification of such sites.

Henley Business Park, Normandy

While we have concerns over the removal of the site from the Green Belt, since its relationship and impact on the surrounding function of the Green Belt is clear, we note that the site is now largely fully developed and hence there is little further purpose in its removal from the Green Belt. Its status as a protected employment site should be retained whatever its Green Belt status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not honoured this. Freeing up private housing in the town currently used for student accommodation would provide affordable housing for local people. A new development at Blackwell Farm (2,000 houses) providing accommodation, including student accommodation, is a selfish move by the university when it still has 1,000’s of units to be built on land it already owns.

After the 1st World War ‘Homes for Hero’s’ were provided countrywide, as was the case for council housing after the 2nd World War. I believe GBC should adopt the same strategy, even in areas of AONB albeit on a reduced scale, to provide sustainable homes borough-wide and of a proportional nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp171/1143</th>
<th>Respondent: 8605793 / Astenbell Ltd (Nigel Sturgess)</th>
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<td>( ), is Sound?</td>
<td>( No ), is Legally Compliant?</td>
</tr>
</tbody>
</table>

Please see attached word document

[text of attachment reproduced below]

This representation is made by Astenbell Ltd in response to proposed changes in the Reg 19 Draft Local Plan with regards to Policy H1 section 9 and 10 “Self-build and custom housebuilding” and the relevant reasoned justification.

We are the owners of a 5 acre greenfield site off Tannery Lane in Send that was allocated for housing and included in the Reg 18 draft local plan but dropped from the draft local plan between reg 18 and reg 19 consultations.

We were one of only two landowners to promote our land to the council as a dedicated self build site allocation and our full representation on this was included in our previous Reg 19 consultation submission which we believe will be shown to the planning inspector in addition to this representation.

Having seen the changes proposed regarding the Self Build policy in the latest draft we are still of the strong opinion that the council is going to be unable to fulfil its planning obligations with regards to provision of enough plots to satisfy those waiting on its self build register and our reasons are set out below

We ask the council to reconsider its proposed policy and allocate or at least safeguard our site as a dedicated self build site along the lines proposed in our previous submission.

**Demand for self build in Guildford**

Guildford’s self-build register was set up in March 2016.

From March 2016 to 31st October 2016 (8 months) which is the first base period 87 people were entered on the list as being eligible.

From 1st November 2016 to April 30th 2017 (6 Months) a further 57 people were registered.

In total for the first 14 months 144 persons were entered on the list as eligible an average of 10 registrations per month.
In a growing market such as self build It would not be unreasonable to expect that by December 2018 (33 months) at current levels there could be 330 persons eligible on the register.

**Proposed Provision of plots**

A table analysis of the councils planned provision of plots has been carried out and for the whole life of the plan up to 2034 we consider provision has only been made for 312 plots. (see table below)

Information has been extracted from the Guildford borough Proposed Submission Local Plan: strategy and sites document June 2017 together with further data from the Guildford Land Availability Assessment 2016 LAA document as well as the councils current and past planning application web portal.

The councils emerging policy looks to rely on large sites of over 100 dwellings to make 5% of their total homes available and priced and marketed appropriately as self-build or custom build plots for at least 18 months.

The table below summarises the sites and how many self build plots they are expected to provide and information from the LAA has indicated likely timescales.

<table>
<thead>
<tr>
<th>Policy No</th>
<th>The Sites below have been allocated to provide 5% of their plots to be offered as self build plots</th>
<th>Number of Self Build plots at 5%</th>
<th>Anticipated Self Build Plots delivery timeframes</th>
<th>Estimated delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>POLICY A22</td>
<td>Land north of Keens Lane, Guildford The site is allocated for approximately 150 homes (C3), including some self-build and custom house building plots and a care home (C2) with approximately 60 beds</td>
<td>8</td>
<td>It is anticipated from the LAA2016 that this site could be delivered in the first five years of the plan which could make available 8 self-build plots</td>
<td>8</td>
</tr>
<tr>
<td>POLICY A25</td>
<td>Gosden Hill Farm, Merrow Lane, Guildford This is a residential lead mixed use development, allocated for: (1) Approximately 2,000 homes of which a minimum of 1,700 homes (C3) will be delivered within the plan period, including</td>
<td>85</td>
<td>This site is dependent on the delivery of major highway infrastructure improvements. The LAA 2016 spreads this large strategic development over the life of the plan</td>
<td>45</td>
</tr>
<tr>
<td>POLICY</td>
<td>Description</td>
<td></td>
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<td></td>
<td></td>
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</tr>
<tr>
<td>A26</td>
<td>Blackwell Farm, Hogs Back, Guildford</td>
<td>This site is dependent on the delivery of major highway infrastructure improvements. The LAA 2016 spreads this large strategic development over the life of the plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A29</td>
<td>Land to the south and east of Ash and Tongham</td>
<td>This land is in multiple ownerships of differing size land parcels with development proposals anticipated to come forward at different stages throughout the plan. One consented scheme for 400 homes contained no provision for self build another for 254 under appeal contains no self build plots and another for 154 awaiting decision contains no provision. There are very few other sites large enough to support the 100 home threshold therefore current proposed policy would suggest that no self build plots are likely to come forward from this strategic allocation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A32</td>
<td>Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford</td>
<td>It is anticipated from the LAA2016 that this site could be delivered in the 6-10 year bracket which could make available 6 self build plots.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A35</td>
<td>Land at Former Wisley airfield, Ockham</td>
<td>This site is dependent on the delivery of major highway infrastructure improvements and overcoming several contraints. The LAA 2016 spreads this large strategic development over the life of the plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>POLICY</td>
<td>Land description</td>
<td>Homes (C3)</td>
<td>Notes</td>
<td></td>
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<tr>
<td>A38</td>
<td>Land to the west of West Horsley</td>
<td>135 homes</td>
<td>It is anticipated from the LAA2016 that this site could be delivered in the first five years of the plan which could make available 8 self-build plots.</td>
<td></td>
</tr>
<tr>
<td>A39</td>
<td>Land near Horsley railway station, Ockham Road North, East Horsley</td>
<td>100 homes</td>
<td>It is anticipated from the LAA2016 that this site could be delivered in the first five years of the plan which could make available 8 self-build plots</td>
<td></td>
</tr>
<tr>
<td>A40</td>
<td>Land to the north of West Horsley</td>
<td>120 homes</td>
<td>It is anticipated from the LAA2016 that this site could be delivered in the first five years of the plan which could make available 8 self-build plots</td>
<td></td>
</tr>
<tr>
<td>A43</td>
<td>Land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley</td>
<td>400 homes</td>
<td>It is anticipated that due to the size of this allocation and the adjoining highway infrastructure improvements it could be delivered over the first 10 years of the plan which could make available 20 self-build plots</td>
<td></td>
</tr>
</tbody>
</table>

Total provision based on current policy: 312 homes, 0 plots.
As can be seen from the table, assuming all the site allocations expected to deliver Self Build plots are granted planning permission then 312 self build plots will be made available over the length of the plan. (2017- 2034) We feel this number is going to be wholly inadequate to satisfy the growing demand on the register.

It is difficult to estimate delivery of these plots as they are reliant on planning applications coming forward which in turn are reliant on infrastructure improvements. The timeframes for delivery of these plots has been estimated in line with the estimated timelines in the LAA 2016. As per the reasoned justification on strategic development sites, the delivery of a significant proportion of self-build or custom build plots will be expected within the first phase of development.

From the table 161 self build plots might be available in the first 5 years after adoption of the plan, 81 more in the second five years and 70 in the third five years.

There are other sites allocated in the draft over the 100 home threshold but for one reason or other they have not been specifically allocated to provide the 5% self build plots. Many of these are town centre high density flat developments which are planned to be exempt from the requirement to provide plots as reasoned in the justification.

The table below shows these other allocations in the plan over the 100 home threshold

<table>
<thead>
<tr>
<th>Sites over the 100 home threshold not allocated for Self Build</th>
<th>Reasons for discounting them</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy A5 Jewsons Walnut Tree Close, Guildford. Flattened development 175 homes</td>
<td>It is not considered that this site is suitable for Self Build plots as it is Town Centre flatted development with an anticipated density of 171dph</td>
</tr>
<tr>
<td>Policy A6 North Street Re development, Guildford. Flattened development 400 homes</td>
<td>It is not considered that this site is suitable for Self Build plots as it is Town Centre mixed use with flats development with an high anticipated densities</td>
</tr>
<tr>
<td>Policy A7 Land and Buildings at Guildford Railway Station Flattened Development 350 homes</td>
<td>It is not considered that this site is suitable for Self Build plots as it is Town Centre high density flatted development scheme with an outstanding appeal pending</td>
</tr>
<tr>
<td>Policy A11 Guildford Car Park Consented Development 160 Homes</td>
<td>This site has already been consented with no provision for self build</td>
</tr>
<tr>
<td>Policy A13 Kernal Court, Walnut Tree Close Flattened Development 100</td>
<td>It is not considered that this site is suitable for Self Build plots as it is a Guildford Urban area flatted development with an anticipated density of 181dph</td>
</tr>
</tbody>
</table>
Out of the allocations in the table above it is only Site A15 and A24 that could realistically offer some self build plots but as these have not been included on the allocation details they have been discounted.

We consider it unlikely that the demand figures will decrease over time as the self build sector gains momentum, however even if demand in this sector were to wane the “over supply” of plots would not cause problems as there is a proposed clause in the policy stating that developers could simply build out any surplus plots after a period of marketing.

Undersupply however is likely to cause the Council problems in the future whereby they would have to apply to the Secretary of State for an exemption from the duty to provide serviced plots where demand for serviced plots is high but the supply of land for housing is constrained.

Exemptions are not automatic and there is a test that local demand must be greater than 20% of the total land available to meet an authority’s future housing need. There are time limits when such applications need to be made; and a requirement for evidence to be provided. An exemption only relates to a given base period and does not remove the duty for an authority to have regard to demand on its register when carrying out their housing, planning, land disposal and regeneration functions, as provided for by the 2015 Act.

There would therefore seem to be no downside in over providing for self build plots but plenty of downside for under supply. We therefore believe the most important part of the Councils emerging policy is to make sure that there are enough serviced plots available to satisfy the demand on its register on an ongoing basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: reg 19 2017 reps.docx (24 KB)
“The most efficient use of existing urban and previously developed land”.

Development of brownfield sites is the first priority. We also will need to look at the vexed question of higher density whilst having regard to existing character not only in Guildford but also other sustainable locations such as Ash and Tongham. This extra emphasis is necessary in order to lessen the need for the consideration of open land whether within the Green Belt or the countryside.

We must use all the urban land that is available for housing efficiently. We need to look for previously developed land which is no longer required for business or other employment purposes. One important priority is to identify whether there is a backlog of sites in Guildford Borough, for which planning permission has already been granted but not yet been developed. In the past, a great deal of windfall development has contributed towards our planning targets. CPRE sees no reason why this should not be the pattern for the future as well. Many older buildings survive which are still named after their former use. We believe that change will result in individual sites becoming available with the closure for example of small businesses such as local newsagents, post offices, builders yards, and pubs. We would therefore question whether the estimate made in Policy S2 of 625 dwellings from 2018 to 2033 is accurate and sufficient, bearing in mind past rates of achievement in this category. Every effort should be made to include a realistic figure for windfalls which in the past has proved such a valuable element of the housing provision.

It is important that the University of Surrey meets its commitment to build the multi occupancy student housing on its two campuses that it has promised in the past. CPRE maintains that from now on 100% of new student accommodation should be provided on the University of Surrey’s two campuses, both of which have sufficient space to replace sections of surface parking for this purpose. We object to the figure of only 60% of existing students being accommodated on Stag Hill and Manor Park. We consider that the figure should be higher and the policy wording with its use of the words “we expect” strengthened. This would reduce the problem of students using leased housing for multi occupancy in the town that otherwise would be available for year round use by young families with working parents.

The policy does not indicate the density of housing within urban Guildford which should be the objective for future building. Clearly, this is a sensitive issue which will be affected by a wide range of factors including conservation areas, height and design. All surface parking sites should be carefully assessed to evaluate whether more multi storey facilities or underground parking could be considered which use precious space better. We are aware of many individual garages in rear gardens with access to a road which are neither attractive in appearance nor fulfilling an efficient use of land which could be built on. We object that the Policy does not include a density figure, or range, for new housing within the urban area of Guildford, Ash and Tongham. With suitable land so scarce and pressures mounting on open land and Green Belt surely it is time to be pragmatic and realistic by specifying higher densities for building where this can be done without harming the quality of life of the community.

There is a need in the town for more flats which are conveniently located for independent older people that wish to downsize from their current residential accommodation.

The development of the former Surrey Advertiser offices on Martyr Road is an example of what is required. CPRE objects to the excessive amount of retail proposed in the town centre on land which could be regenerated with housing.
POLICY H2 Affordable homes

Defining exactly what is meant by the word “affordable” is as difficult as asking for a definition of “sustainable”. It is hard to believe that 80% of the market value of a house in Guildford would fit this definition and be considered affordable. We do not think that the extensive glossary definition provided will be valid for long, given the Government’s constant tinkering with this difficult area with its tax and other incentives. We also have difficulty with the enthusiasm in political circles for the “right to buy” concept which we believe will eventually have to be reconsidered.

Developers generally prefer to make more money by building larger mansions which bring in more profit for them than affordable home initiatives. The demand for new housing in this county is almost limitless so the impact of what is proposed in the draft Local Plan will not in our opinion have any effect on house price levels.

We support the proposals made for affordable housing being required for sites of 5 or more houses or sites of 0.17 hectares or more regardless of the number of homes involved. We also agree 40% of these homes should be affordable. We agree with the policy which requires for 70% of the affordable homes supplied to be for rent. We wonder how far these objectives will be achievable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp171/1980 | Respondent: | 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold) |
| Agent: | | Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy H1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | () | is Sound? | () | is Legally Compliant? | () |

Housing Mix (2) : CPRE suggests that the first sentence should be further amended as the use of the word “all” appears inappropriate.

Student accommodation (5) : CPRE would suggest that the word “about” is removed at the start of the second sentence. CPRE argues that all first year students should be accommodated on campus and overall 80% of students should be living there each year rather than the 60% promised figure which has not been met.

Gypsy, Traveller and Travelling Showpeople pitches and plots (6) : CPRE objects to the words “as well as to cater for the potential additional needs of households of unknown planning status” and the sentence “Sites are also allocated within the Local Plan to contribute to meeting the assessed needs of Gypsies, Travellers and Travelling Showpeople who do not meet the Planning Policy for Traveller Sites definition.” We accordingly object to the words in Paragraph 7 “(whether they meet the Planning Policy for Traveller Sites definition or not)”.

Reasoned Justification 4.2.3: We suggest that the word “projected” or “estimated” is included in an appropriate location in the first two bullet points.

Density 4.2.8: We object to the removal of this paragraph.

Student accommodations 4.2.18: CPRE believes that the University of Surrey should provide 100% of first year students with accommodation on campus and that the current agreed policy requiring 60% of its overall student accommodation to be on campus should first be met and secondly increased to 80%.
Gypsy, Traveller and Travelling Showpeople 4.2.22 CPRE objects to the wording of the last 2 additional sentences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1044  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WBDRA is in SUPPORT of this policy and firmly believes that there should be a higher housing density in the town centre

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2384  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all We object to this policy.

A greater proportion than 60% of Surrey University students should be housed in university accommodation. The university should be encouraged through this Plan and the planning process to increase provision of university accommodation. It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9085  Respondent: 8609377 / Mr Andy White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Student housing, before and after study, has not been dealt with appropriately. A target of 100% of students on campus should be the target. University of Surrey has existing planning permission to build more accommodation but has not implemented it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)</th>
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<td>Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>We note and support the following policies in the Plan</td>
<td></td>
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<tr>
<td>7.2 Policy H1, Homes for all states that</td>
<td></td>
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<tr>
<td>“New residential development is required to deliver a wide choice of homes to meet a range of accommodation needs...and.....provide a mix of housing tenures, types and sizes appropriate to the site, size, characteristics and location”</td>
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<td></td>
</tr>
<tr>
<td>We welcome this statement and hope that this aspect of the policy will reduce the number of new developments for large “executive “ homes which do not meet local need.</td>
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<td>H1 Homes for All</td>
<td>Support – There should be a higher housing density in the town centre.</td>
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<tr>
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</table>
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. We support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 5-6 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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As a Guildford resident I am extremely concerned about the high number of new homes proposed in the latest version of the local plan. This would lead to loss of substantial amounts of Green Belt land and loss of local character.

The method used to calculate the number of proposed new homes has never been explained. I am concerned that population growth has been overestimated due to under recording of students leaving at the end of their studies. I also believe that, as a campus university, Surrey University should provide more student accommodation on site, thus freeing up affordable housing stock in the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Student accommodation: it would be very beneficial for the housing stock in Guildford if all students either lived at home or on campus.

HMO: rather than assuming that HMOs are a poor quality option, it would be a good plan to encourage new building of this type which could provide good quality accommodation for rent for single people who work in Guildford.

Smaller, manageable homes for downsizing, perhaps in a courtyard development, with some help that would make the process manageable for older people, would benefit them and release larger homes to the market.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/5049</th>
<th>Respondent: 8667713 / Victoria Sinnett</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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12. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on outofdate, preBrexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, highrise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 45 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks).

If all students I re accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/2303</th>
<th>Respondent: 8671969 / Valerie Thompson</th>
<th>Agent:</th>
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H1/H2

I OBJECT as homes for all is an impossible dream, as there always will be people who cannot afford the inflated prices of the so-called “affordable homes.”
Only if GBC were able to build more Council Houses, rather than selling them off, would it be possible to house everyone.

There is no "right" to own a home; other countries have many more rented properties than England.

GBC should not have allowed the University to renege on the deal it struck several years ago, to build student accommodation, rather than encouraging students to fill houses needed by Guildford's own people.

GBC needs to build low-rise flats and underground parking to accommodate people, who want to live and work in Guildford.

Developers will use the viability clause (4.2.40) to get out of providing ANY affordable homes on each site.

This policy does not state by what rules will be applied to constraints, such as existing density in Villages.

GBC has proposed density more than twice that which exists at present in every site they want to build on in West Horsley. At present there are 1100 homes in WH, but GBC are proposing to increase this by a 35%, turning what is at present a semi-rural community into a small town. The Parish Council and the Neighbourhood Plan Committee have twice surveyed the need in WH for new homes and have reached a number approximately one fifth of that proposed in the Draft Local Plan.

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp171/57</th>
<th>Respondent: 8671969 / Valerie Thompson</th>
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**SHMA**

I object to the fact that research resulting in the SHMA has not been made public

GBC have broken a lot of rules in preparing the SHMA.

They subcontracted to GL Hearn, who subcontracted the work to Justin Gardner. This was against their own rules. Justin Gardner then claimed that the research which led to the numbers of houses needed was their “intellectual property”, therefore they were not obliged to share this information with anyone, not even the Councillors! Mr Spooner, Leader of the Council, claims not to have seen the research. How can he and his executive team make any reasoned decision without seeing the evidence?

The document Strategic Housing Market Planning states that consultants “should ensure that there will be no data protection or commercial restrictions on the storage and sharing of data used in the assessments”. This was not done

The Strategic Housing Market Assessment Practice Guidance document V2 Aug 2007 (1.1.2.5) states that “assumptions, judgements and findings are fully justified and presented in an open and transparent manner.” This has not been done.

These last two points have been entirely and ruthlessly ignored by GBC as they have refused on many occasions, even when information was requested under the FOI Act to divulge any research.
With regards to the student numbers in Guildford, the fact that most of them leave and live elsewhere, after finishing their degree, has not been taken into consideration, and plans to accommodate students have skewed the numbers of houses required by the GBC, probably by about 25%.

The University should be forced to build the student accommodation for which it was given land and building permission. GBC should not allow any further increase in student numbers, nor any further buildings on the site, until the university has fulfilled their agreements regarding student accommodation. This would release large numbers of inexpensive flats in Guildford for local occupation and reduce the numbers of houses needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/15166</th>
<th>Respondent: 8672993 / Kes Heffer</th>
<th>Agent:</th>
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The statement on housing mix in policy H1 that ‘New residential development is required to deliver a wide choice of homes and meet a range of housing needs as set out in the latest Strategic Housing Market Assessment’ is misconceived. All detailed surveys of housing need in the Borough conducted by local organisations (i.e. by local people who, by dint of NPPF paragraph 17, should be empowered; not by remote, development-biased consultants) conclude that the most pressing need is for affordable housing. Consequently, the proportion of affordable housing catered for in the Local Plan should be as high as possible, ideally about 80% of total projections. These are the only houses that the borough actually needs for its indigenous population. Students at Guildford University are the only migrants that the borough needs in significant numbers; they should be accommodated in dedicated buildings around the University. There is a shortage of homes for local older people, especially in the rural villages: if they could be accommodated in specialised, attractive smaller homes, they would free up a number of larger houses for younger people. The Borough does NOT need many more 5-bedroomed mansions in order that wealthy families can move to a (currently) attractive area, either as owners or renters of property owned by foreign investors. Allowing such developments will mean that they will comprise an excessive (relative to proper need) proportion of the housing mix provided by developers, simply because most profit can be obtained from them – especially if built in greenfield sites such as the PDAs earmarked around West Horsley and other rural villages. This is a beautiful area and therefore attractive to many. Catering for all of them will destroy that beauty and the continuity of the Green Belt. There is no ‘right’ for people to be able to fulfill a desire to live in one of the most beautiful parts of the country (certainly in the over-crowded South-East of England). It would be perverse to the point of madness to try to assuage such desire by additional development. Providing infrastructure in attempts to meet the new needs of migrants into the Borough would simply encourage even more. As with policy S2 this policy would also inevitably lead to exponentially growing numbers without end.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1538</th>
<th>Respondent: 8687041 / Michael Aaronson</th>
<th>Agent:</th>
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I OBJECT: because this Policy rests on the flawed assumptions of the SHMA; because there is insufficient emphasis on high density urban development, which is more sustainable than building in the villages and on the Green Belt; because
the University should be made to provide more student accommodation on campus; and because the provision for Travellers fails to acknowledge the already high level of provision for this group across the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1066  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

1. This has been challenged by residents including, by Mr Ben Paton, as far as the Information Ombudsman But the Council have consistently refused to seek disclosure of the model.

2. See http://www.glhearn.com/developer/Pages/Overview.aspx: “We act for many of the leading ” G L Hearn is now part of Capita Real Estate.

3. See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016: “I would like to highlight the difference between the Objectively Assessed Housing Need (OAN) figure produced by G L Hearn (693 homes per year) and the Housing Target for the Local Plan. Some opponents of the Local Plan appear to blur the edges of the two figures. The OAN figure is the one produced by the modelling tool. The Housing Target figure is the proportion of the OAN that the Council feels it can successfully deliver. Based on the infrastructure that Highways England, Surrey County Council and others suggest they can provide over the next 15 years, the Council believes it can deliver the full OAN number as the Housing Target. However if, during this consultation, or later on, the anticipated infrastructure is not going to be provided then the council will be forced to apply further constraints to the OAN number, which may reduce the Housing Target number. Therefore, it is clear that the OAN and the Housing Target are not the same. The OAN is objective and the Housing Target is subject to constraints.”

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2618  **Respondent:** 8693153 / Vicki Willetts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL): • Policy doesn’t set any constraints on building. • Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors. • Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation. • Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8884  **Respondent:** 8694369 / Nicola Ogilvie Smals  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The local plan sets out the strategy relating to the mix of housing requiring most efficient use of land which is appropriate to the site size, characteristics and location. New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness.

The 2011 census indicates West Horsley is comprised of 1111 households; adding a further 345 homes by 20220 as detailed in sites A38, A40, A41 is a 35% increase to the current number of households in the village. The majority of new homes are proposed at the northern end of the village, the estimated number of households in the area classed as West Horsley north is around 400; the proposed sites therefore represent an increase of almost 100% to this area. This is in no way in accordance with the draft policies or with the NPPF guidelines. The character and community of this area of the village would be eliminated.

The current density within the current settlement boundaries of West Horsley is just under 10 dwellings per Hectare; the proposed density is 14-20 dwellings/ha which is a 40-100% increase to the established village density. The development densities are likely to increase once existing uses are considered (for example the grade II listed building and nursery school on site A38)

Furthermore the economic strategy does not make a case for the location of so many homes within the village of West Horsley and contradicts many statements in the local plan, not least the overarching presumption in favour of sustainable development. It is not sustainable to propose so many homes in one village; an increase of nearly 100% to one end of the village of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/11499  **Respondent:** 8706625 / Hilary Barker  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT VERY STRONGLY to the strangle hold and seemingly the power that the University has over GBC. They must be relieved that the majority of Guildford residents are blissfully unaware of all the broken promises made by the University and the effect this is having on housing demand and housing shortage.

- The University has been expanding its numbers year by year – now 13,700 which makes up for 10% of the borough population (SHMA appendix C)
- Student growth now accounts for 50% of the recent growth of Guildford.
- We are now told that the University wants to expand to 17,000 students by 2017 – another 3000 full time students in the next 3 years.
- In 2003, in order to accommodate this growing rise in student numbers, GBC took Manor Farm (given to the University) out of the Green Belt specifically to allow the University to build a campus for their students and staff – 4,790 units.
- They have only built 1,665 units and we are still waiting for the other 3,125. The land is still available but is being squandered by concreting over large areas to create surface level car parks which should, at least, have student units built above.
- If the University was made to fulfil their 2003 commitments and house 60% of their students and staff on Manor Farm campus it would free up to 1,300 houses in Guildford and provide some much needed “social housing”.
- It would provide an income of 1.2 million for GBC as students/landlords are not obliged to pay council tax.
- By not building the student units on Manor Farm, the University is creating its own housing demand and this is reflecting on the Local Plan’s housing “need” numbers in the borough as it is being artificially raised.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11503 **Respondent:** 8706625 / Hilary Barker **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the number of extra Traveller Pitches allocated to Worplesdon Parish and the insetting of Green Belt in order to create these Traveller pitches.

It was said in the previous draft plan “We have sought to select sites carefully and in a way which does not over burden any single area of our borough and ensure that the right infrastructure is in place.”

Worplesdon Parish and other adjoining Parishes of Normandy and Ash in NW Guildford have for many years taken the larger share of Traveller and Showman’s sites and is now over-burdened.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2406 **Respondent:** 8708289 / Frances King **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Housing

The number of houses proposed, 12,466, will still mean that Guildford Borough will have grown by nearly 25% by 2034 which is nearly double the Office for National Statistics prediction for the growth of Guildford.

Guildford town centre needs more housing rather than retail space. The growth of online shopping is particularly relevant in this context there are many reports showing there are major changes in the ways of shopping.

The eastern side of the borough is scheduled to take an even greater proportion of new homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11626  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy in the blue box says is that the Council will encourage building over the plan period. We need rules, context and we need a proper framework.

The housing mix is based on out-of-date, pre-EU exit projections and on assumptions set out in a flawed SHMA that has not been scrutinised.

Higher density development in the urban area would be an improvement, not high rise ruining the views but sensitive regeneration with 3-4 storey blocks with landscaping and underground parking.

How can Guildford trust GL Hearn “We act for many of the leading developers.” “Focused on maximising returns from real estate assets.” and part of Capita Real Estate, when it is not in there interest to act for GBC.

Student accommodation should provided for all of new students and more than 60% of existing students by the Uni, freeing ideal family accommodation in the urban area. Other university cities insist on higher percentages than those proposed in the plan. Surrey University, has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks).

If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9051  Respondent: 8723809 / Sally Blake  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY H1 – Homes for all

- The policy doesn’t set any constraints on building.
- Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- I support higher density development in the urban area
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3233  Respondent: 8726529 / Eric Palmer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Page 46 of 445
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Object

There has been wholesale mismanagement of the University since the 2003 local plan, with a complete failure to enforce the policies agreed at that time. Specifically related to building for student accommodation. Many of these issues detailed in my last submission (and others), but have not been addressed. I have summarised again under policy S2.

Failure to build the accommodation is a very poor thing for Guildford, and should put the University at the top of the bad developer list.

I support high density development in the urban area, but this plan does not deliver it.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers. This policy needs to be in line with the Traveller Guidelines issues and included in the NPPF in August 2015.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/16902  **Respondent:** 8728865 / Neville Bryan  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

The University of Surrey students are steadily taking over Guildford – a town with a population of around 70,000 inhabitants. There are now 14,000 students with only 5,500 campus accommodation places. There are at least 1,500 HMO’s in Guildford occupied by students and that number is growing. Student accommodation should be provided by the University of Surrey for 85% of all its full time students overall, with 100% of new students and more than 60% of existing students accommodated. Active promotion of this policy would allow 1000 houses to be released from HMO occupancy and find their way back to the local communities, for family housing in the urban area.

We support high density development in the urban area.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers. This policy needs to be in line with the Traveller Guidelines issues and included in the NPPF in August 2015.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/18568  **Respondent:** 8728865 / Neville Bryan  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

A phased plan would only affect future intakes. I.e those currently studying for their GCSEs. Future candidates would be applying to Guildford in the knowledge that this was a "campus university" in the true sense of the word.

It would be possible for the University to encourage students to live on campus by making the accommodation cheaper or by including accommodation costs within the student fees. Exceptions could be made for students who were married with families or who wished to live with their parents or who had other good reason for living in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1899  Respondent: 8728865 / Neville Bryan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object -  All original objections remain. In addition

The amended definition does not provide for enforcement or corrections for the previous under provision of student accommodation by the University of Surrey.

Housing targets should include the students, however due to restricted land supply, future expansion (and previous under build to 2003 commitment) should 85% be accommodated on the University campus. We are recommending at a minimum, 4500 student accommodation places to meet the 2003 plan proposals (not provided), plus 1 student place for each additional FTE student attending the University of Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2045  Respondent: 8729217 / Karen Stevens  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Density

I object to the deletion of the paragraph on density:

“New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

This suggests that GBC does not intend to build at a higher density on its new developments or within the existing urban area (which is the most sustainable location for development). The latest government white paper, Fixing our broken
housing market[4], promotes “increasing the density of development”. It states:

“To help ensure that effective use is made of land, and building on its previous consultations, the Government proposes to amend the National Planning Policy Framework to make it clear that plans and individual development proposals should:

• make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs;
• address the particular scope for higher-density housing in urban locations that are well served by public transport (such as around many railway stations)”

Whilst I do not support any of the proposed development sites within the Metropolitan Green Belt (until legitimate constraints have been applied to the OAN and exceptional circumstances have demonstrated that these are necessary), were these to go ahead, the provision of housing should be at much higher densities in order to reduce adverse impact on the green belt and to avoid building on high quality landscapes such as at Blackwell Farm, which lies in the setting to the AONB. Across the whole of the borough, there is a high proportion of low-density housing – large units with large gardens. Even social housing in areas such as Fairlands and Park Barn has been built at a low density. Many of these family homes are now being used inappropriately as HMOs for student.

According to a report by Frank Knight[5], there are 3,500 students living in shared private rented sector dwellings. If alternative, purpose-built, smaller units existed for students, it would eliminate the need for these HMOs and they could be returned to homes for family groups.

The case study accompanying the 2017 Housing White Paper cites densities of 45-70 dwellings per hectare (dph) in the “urban, riverside and gateway quarters” of the award-winning Trumpington Meadows development outside Cambridge. It further states: “The lower density village quarter (30-45 dwellings per hectare) will provide larger, 3-4 bedroom homes”. [Emphasis mine.]

GBC’s Local Plan, in contrast, has:

• 23 dph at Blackwell Farm
• 22 dph at Gosden Hill
• 21 dph at Wisley Airfield
• 18 dph at Ash and Tongham
• 37.5 dph at Slyfield.

Apart from at Slyfield, which matches the “lower density village quarter” in terms of density, these proposed densities are very low. If GBC were to build at what the housing white paper terms “low-density” (ie around 40 dph) on the Countryside Beyond the Green Belt at Ash and Tongham, there would be no need to build on Blackwell Farm or on one of the other strategic sites within the green belt. Alternatively (and preferably), if GBC were to increase the density at the Slyfield Regeneration Site (a brownfield site within the urban area) to 75 dph, which is comparable to parts of Trumpington Meadows, this would also eliminate the need to develop one of the strategic green belt sites.

GBC has ignored the proposed amendment to national planning policy in the latest Government white paper on housing, as it has not demonstrated that it has “examined fully other reasonable options for meeting their required development requirements”, including “optimising the proposed density of development” (1.39)

Furthermore, Edge Analytics, which GBC commissioned to review the GL Hearn SHMA in 2014, stated: “Whilst it is evident that Guildford Borough has a particularly acute affordability issue, it is less clear how an upwards adjustment to housing provision would manifest itself as an improvement to the affordability position”.[6]

[Figure 3] – The University of Surrey has more than 17 Ha of surface car parks across its estate. The University suggested (in the Council chamber at Millmead) that development on its main Stag Hill car park was not possible as it formed part of the landscape design for its campus. At the same time, the University was seeking to develop new homes on Blackwell Farm on the Green Belt and was actively promoting building on the AONB

Given that boosting housing provision is unlikely to make housing in the borough more affordable, it is incumbent on the Council to consider alternative ways of deliver housing more cheaply and one such way is achieved by building more densely.
Student housing

I object to the changes in relation to student accommodation:

“About 60 per cent of full time Guildford based University of Surrey eligible students (full time equivalent) are expected to be provided with accommodation on campus.”

The addition of the word “about” weakens this policy and would enable the University to reduce the level of student provision below that which it committed to in the 2003 Local Plan.

As stated in my 2016 response, the University should provide accommodation for 100 per cent of its future Guildford-based student population, and 80 per cent of its existing student population on its two campuses at Manor Park and Stag Hill (which it could implement over the next three years without affecting any existing students). This would help the housing situation as it would quickly free up more than 1,000 houses close to the town centre, Hospital, Research Park and University.

By building student accommodation, the University would effectively be freeing up family homes close to the town centre, which are at a higher density than the proposed executive homes on Blackwell Farm. This would be a much more efficient plan for Guildford’s existing housing. It would also allow new development in the town to focus on the smaller units required due to changing demographics, which in turn would be more affordable. Furthermore, it would release Hazel Farm (promised at the last Local Plan) to be freed up for residential space/care/sheltered accommodation for the elderly – the type of accommodation required due to the changing age profile of the borough.

Increasing the proportion of students on campus would be of benefit to both Guildford and to students, who currently pay considerably higher rent in the private-sector market. The report by Frank Knight reveals that:

“University rents for self-catered accommodation range from £69 - £99.50 per week (for shared non en suite accommodation) to £205.00 per week (for studio self-catered accommodation). The standard letting term is 38 weeks for undergraduates and 50 weeks for post-graduates, rents are paid inclusive of bills.”

[Table 2] – In 2003, the University of Surrey committed to housing 60% of its students on its two campuses. This table showing “the existing and potential total supply of bed spaces” indicates that only 36.8% of its students are currently in purpose-built student accommodation (PBSA), and that there is future provision for a total of 44% of students to live in PBSA. As 141 PBSA bed spaces are provided by a privately-operated company (Scape), the University has clearly fallen well below its 2003 commitment.

By comparison, advertised rents from private landlords during the 2016/2017 academic year “range from £195 to £205 per week for en-suite rooms and up to £310 per week for studios, inclusive of all bills” and “All rooms are provided as 51/52 week tenancies.”

Further data contained with the Frank Knight report shows that Guildford has “both a low existing and pipeline bed space count compared to its student population” and that, compared with other university cities, “Guildford is second lowest in terms of existing supply of bed spaces and second lowest in terms of student numbers. In comparison to Liverpool and Newcastle, the second and third largest university populations, it has considerably less existing and pipeline bed space supply.” [Emphasis mine.]

The report concludes that, “the market in Guildford for student accommodation is currently structurally undersupplied. The consented pipeline of proposed developments will do little to re-address the lack of student accommodation.”

The Council’s reluctance to increase the proportion of students living on campus, along with its failure over the past 13 years to encourage the University to build out its existing planning permissions for student accommodation in a timely manner, or to build more efficiently across its estate, (for example by building over its extensive surface car parks), are all indications of the Council’s pandering to the University and its drive to increase house building, rather than seeking alternative solutions, which would have less impact on the environment.
There is also clearly a huge conflict of interest with the University, which had previously argued the case for increasing the amount of purpose-built student accommodation when it wished to expand onto its Manor Park campus in 2003. Building this accommodation would clearly weaken the case for taking Blackwell Farm out of green belt – a move that would present it with huge profits. It is therefore no surprise that it has been slow to deliver on the commitments it made in 2003 (including the promise to provide greater access to Blackwell Farm for public recreation/benefit).


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

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Comment ID: PSLPP16/9650  Respondent: 8729569 / Carolyn Kimpton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1 Homes for All

I support high density housing in urban areas, and would encourage the University to provide the majority of student accommodation on site with the land they have available. Thereby releasing a large number of rental houses back onto the market. Allocation of additional travellers sites to be reviewed as currently generous allocation in comparison with other boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6707  Respondent: 8731649 / Ian Slater  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: pslp171/114  **Respondent:** 8732321 / John Freeland  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Use of Land - Policy H13 the wording relating to density of housing in Policy H1 has been removed, leaving the door open for developers to use land inefficiently or inappropriately.

This plan seems to have been drawn up entirely for the benefit of avaricious developers, supported by a few greedy landowners, most of whom do not reside in this area and are therefore totally unconcerned at its destruction. The evidence base is heavily flawed, misleading by error/omission and skewed completely towards housing development in the Green Belt at any price to the local environment, and complete disregard for the aspirations of local residents.

Quite simply, if this plan is allowed to go ahead it will be an absolute disaster for the local community and I sincerely trust there will be sufficient objection to force the council to re-think its position.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/13929  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Quite simply, if this plan is allowed to go ahead it will be an absolute disaster for the local community and I sincerely trust there will be sufficient objection to force the council to re-think its position.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15817  Respondent: 8732993 / Michael Weber  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/550  **Respondent:** 8733857 / Tony Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Use of land – density POLICY H13.**

The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that developers will use land inefficiently, putting additional pressure on the countryside and un-developed land. This deletion is inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12956  **Respondent:** 8735873 / David and Gillian Allan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/427  **Respondent:** 8743073 / Darrell Howard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

It is disappointing to see that the Council continues to persist with its misguided and unjustified approach towards housing development in the Borough. The latest draft of the Plan has changed very little from the previous version suggesting that Council officials have paid lip service to last year’s consultation process and that the Council is hell bent on ignoring the opposition of thousands of borough residents to the proposed plan.

Whilst the new plan has made some minor reductions to its proposed housing in the Green Belt as compared to its 2016 version, what remains is still excessive and unjustified housing development. The Council has still not justified its proposed housing figure and has shown no interest in protecting the Green Belt from excessive development. The new Plan’s “objectively” assessed housing target whilst lower than in last year’s plan, will still mean that by the end of the Plan’s period Guildford will be 25% bigger than it is today. This is nearly double the ONS forecast for the same period for Guildford. The Council continues to ignore retail marketing data indicating that online retail is the driving force, not footfall in physical shops - Guildford Town centre does not need more shopping space, it requires more residential apartment type property.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLP16/3922  **Respondent:** 8744161 / Michael Bridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
H1 Blue Policy Box

I object to the removal of the following paragraph, page 33 from the Policy statement box:

"Density
New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre."

I propose the reinstatement of the following paragraph to the Policy H1 Policy Blue Box:

"Density
New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre."

Para 4.2.8

I object to the removal of the following paragraph, page 38 para 4.2.8 as follows:

"Density
4.2.8 We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials."

I propose this paragraph be re-instated. Without recognition of density requirements, Policy H1 will fail monitoring and any future assessment.

It is essential to recognise and state in Policy H1 that different sites will sustain different dwelling densities for effective use of land and local sustainability. Removal threatens inappropriate densities in smaller rural communities and under-delivery of high-density development in Guildford town centre. Lower densities in rural locations threatens to increase sprawl that is otherwise prevented by Green Belt protections, higher density would be inappropriate in rural locations; lower densities in Guildford town threatens to reverse the benefits of the emerging brownfield register requirement and failure to deliver the sought for "sustainable development" and "modal shift" by encouraging high density urban development within walking and cycling distance of major transport hubs and local services.

Para 4.2.21

Policy H1, Gypsy, Traveller & Travelling Showpeople pitches & plots

I object to the changes in paragraph 4.2.21, page 40, particularly the removal of a definition of site size where originally "We support small-scale traveller sites (up to nine pitches or plots)" has been changed to "Small-scale traveller sites are supported". I live within 600 metres of a 6-pitch private Gypsy & Traveller site. The traffic generated is of vehicle types...
from private cars to vans, 7.5 tonne trucks and civil engineering equipment, of high frequency and at all times of day and night. A site with a higher number of pitches would have the capacity to generate a level of traffic and disturbance unacceptable to any settled resident within a 500 metre radius.

I propose the reinstatement of the original sentence as below but with a lower number of pitches as this provides certainty for the settled community, removes the capacity of the council to vary its idea of "small" at any time, provides certainty to the gypsy & traveller community, [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] and provide a simple incremental measurement of the success of this part of Policy H1.

"We support small-scale traveller sites (up to six pitches or plots)".

Para 4.2.24
I object to revised paragraph 4.2.24, page 40 which states "The loss of pitches or plots will be strongly resisted."

This council has been dilatory over the last 25 years I have been resident in Normandy in attempting to initiate new Gypsy & Traveller pitches due to political expediency. This statement is typical of a current "have cake and eat it" attitude. Should Gypsy & Traveller sites in the Green Belt have permanent planning permission rejected at appeal for legitimate planning reasons, local politicians and planning professionals in the council have only themselves to blame.

I propose this sentence “The loss of pitches or plots will be strongly resisted.” should be removed from paragraph 4.2.24.

It is a hidden threat to the settled community and represents an attempt to manipulate the rights of the settled community in a negative way via planning policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12314  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5075  **Respondent:** 8770177 / Phil Attwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/4895  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/12860  Respondent: 8773377 / Anthony & Anne Bond  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Brownfield development opportunities are being ignored. We need more homes for students and the elderly in the centre, not more retail space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1777  Respondent: 8773953 / Robin Garnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the deletion of paragraph 4.2.8 regarding Density of housing. It is important that the housing density is appropriate to the area. Brown field sites should be used for high density housing while any developments in rural areas should be in keeping with the existing communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17030  Respondent: 8787969 / K Britton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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Attached documents:

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Comment ID: PSLPP16/7579  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Comment ID: PSLPP16/2740  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Attached documents:

Comment ID: PSLPP16/2352  Respondent: 8806305 / Laurence Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all

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Attached documents:

Comment ID: PSLPP16/2334  Respondent: 8806849 / Roland McKinney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

I object to this policy.

Given the high housing target this is accurately described as "homes for all" - homes for anyone from anywhere, so long as they can afford it. It is not a housing plan for local people, so it is not legally compliant. How could it be homes for all
local residents when there is no mention of social housing and or this will be expanded to meet the needs of local people? There is a total reliance on the private sector, for both market housing and for rental. GBC have no control over the private sector, it can and will do what is right for themselves, not for others, not for the borough. This reliance on the private sector is extraordinarily short sighted. Private sector “affordable” housing for rent is much more costly than social housing. How will low paid workers afford “affordable” housing? So this is not a “homes for all” policy, it is a recipe for a huge increase in the cost of housing benefits for the nation. Then when this is too costly the government will change the rules and scale back benefits - so what will happen to private sector rentals then? There is a need for more social housing.

Using land efficiently is not just about housing density. Surface car parks are unsightly as well as being a very inefficient use of one of our most scarce resources - land. Large existing surface car parks, including those at the university, should be replaced by multi level car parks that include several underground levels, so as to limit the bulk of the car park above ground. Areas freed up could be used for housing, and in the case of the university, much needed on campus student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. POLICY H1

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Attached documents:

Comment ID: PSLPP16/1654  Respondent: 8810849 / Charles Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Attached documents:

Comment ID: PSLPP16/16654  Respondent: 8810849 / Charles Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Attached documents:

Comment ID: PSLPP16/9320  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I OBJECT policy H1 (Homes for all).

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, up to 2,000 homes would be freed up in town.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13769  Respondent: 8819265 / Alan Robertson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• The Council has allowed many existing houses, which would be ideal for first time buyers and those with families, to be turned into houses of multiple occupation, in order to house students, who make no contribution to Council Tax, and who are a wholly transient population. The University should be made to house their students in Halls of Residence within the purlieu of its own considerable land holdings, thereby releasing much needed housing stock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13246  **Respondent:** 8820353 / Gillian Beaton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1367  **Respondent:** 8824513 / Ken MacIntyre  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

### Policy H1 (Housing)

1. I object to the changes to Policy H12 because the 32,000 objections from the last consultation have been largely ignored. The reduction in proposed housing numbers does not come anywhere near to addressing the concerns or the sustainability issues of such an expansion.
2. I object to the flawed population forecasts on which the numbers are based, at twice the rate of the ONS’s forecasts.
3. I object to the proposals for an additional 400 houses in East and West Horsley at a density far above the present level which still take no account of the constraints of traffic and parking on an already congested and poorly maintained road network that floods regularly, water (the South East is an area of severe water stress) and sanitation, and local facilities such as healthcare, schools, shops and Horsley rail station where there is no additional space for parking on weekdays and congestion occurs at peak times for picking up and setting down passengers.
4. I support the Guildford Greenbelt Group’s conclusion:

Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.)

1. I object to the continuing inclusion of the proposal for 2,000 houses and other development in Green Belt at the former Wisley Airfield, for all the reasons given in 3 & 4, by a Cayman Islands registered company whose owners are unknown (a disturbing lack of transparency), all the harder to understand since the original application was rejected by the Council.
2. I object to there being no proper consideration of meeting housing needs by high density development of apartments in Guildford town, of student accommodation on campus, and the prioritising of shopping over housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17041  **Respondent:** 8825057 / Merrow Residents' Association (Keith Meldrum)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

### Policy H1 - Homes for All

**The University of Surrey** - should be required to build sufficient student accommodation for those of their students who wish to live on campus therefore relieving pressure on rented accommodation in Guildford where so many students now live. The recommended figure of 60% of students having their own accommodation on campus in Policy H1 in the draft Local Plan is too low and should be raised. This in turn would release accommodation onto the open housing market. It is disappointing to note that the University currently has planning permission for student accommodation to house 2,120 students which it has not built and yet does not appear willing to use these permissions and it is understood that they only plan to house 42% of its students on campus. It calls into question whether the University is really concerned about the future of Guildford and its surroundings or more concerned about the business case to develop Blackwell Farm to raise money to develop the University.
We recommend that the figure of 60% of University of Surrey students having their own accommodation on campus should be raised.

Homes for All - Care Homes - this policy, inter alia, covers care homes although there is no specific reference to care homes in the policy itself. Mention is made of the need for 242 registered care bed spaces at paragraph 4.2.3- this being derived from the SHMA- and also in paragraph 4.2.10 in the reasoned justification section.

The need for care bed spaces is reflected onto page 18 of the LAA where it states that 51 bed spaces should be provided at 179 Epsom Road, Merrow (LAA site 2235) whilst the same site appears on page 183 of the LAA and is described as a vacant care home where there is a planning application for 24 dwellings which has been refused and is going to appeal

We recommend that page 18 of the LAA be amended to reflect the position described on page 183.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1228  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are disappointed at the very weak amendments made to the draft Local Plan on student accommodation. In the first place the need for student accommodation is being overstated as the independent report from NMSS makes clear.

Secondly the wording in policy H1(5) has now been weakened in that it is no more than an aspiration that 60% of full time students will be provided with accommodation on campus.

We take the firm view that this figure should be a requirement and that a figure in excess of 60% should be incorporated in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1229  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Whilst still appreciating the need for affordable homes, we still take the view that the Local Plan must require a proportion of smaller houses as well as a realistic proportion of one and two bedroom apartments.

Our view on the need for smaller houses has been underlined by recent developments in Merrow where there was no provision for smaller two bedroom houses even though these had been offered by the developer. It remains the case that
many smaller families would prefer to live in a house with a garden rather than an apartment and that clear need should be addressed in this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1752  Respondent: 8825377 / Jane MacIntyre  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the changes to Policy H1. Again the 32,000 objections from the last consultation have been largely ignored. The reduction in proposed housing numbers is insufficient and does not address residents’ concerns or the sustainability issues of such an expansion.

2. I object to the flawed population forecasts, (twice ONS’s forecasts).

3. I strongly object to proposals for an additional 400 houses in East and West Horsley. The density far above the present level, takes no account of infrastructure. There is already traffic congestion on the roads which are poorly maintained and flood easily; the South East is an area of severe water stress; water, sanitation, healthcare, schools, shops and Horsley rail station cannot cope with an increase in numbers. Additional development would adversely affect the villages’ character.

4. I support the Guildford Greenbelt Group’s conclusion:

Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

1. I object to the continuing inclusion of the proposal for 2,000 houses and other development in Green Belt at the former Wisley Airfield by a Cayman Islands registered company whose owners are unknown, all the harder to understand since the original application was rejected by the Council.

2. I object to the lack of consideration for the objections of residents of surrounding villages with regard to proposed developments on Green Belt land.

3. I object to the lack of consideration of high density apartment development in Guildford town to meet the town’s housing need.

4. I object to the suggestion that more student accommodation is required off campus rather than on campus.

5. I object to the prioritising of shopping over housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5576  Respondent: 8826081 / Simon Wilcockson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/3119  **Respondent:** 8826177 / Charles Spence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1 states a principle of homes for all and states that *Residential densities will vary dependent upon the local area context and character and the sustainability of the location*. I object to the way in which this policy has been applied. For example, West Horsley is proposed to increase by 35% and this is on top of development in Clandon, East Horsley and Wisley airfield. This is a completely inappropriate density and is not sustainable (for reasons covered in more detail below). The policy states that *certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope*. I agree with this statement, but sadly there is inadequate consideration of how the infrastructure will cope in those areas with the highest density of proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13390  **Respondent:** 8826369 / Tim Madge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8563  Respondent: 8828353 / Claire Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Presumption in favour of Sustainable Development (Policy S1), Borough Wide Strategy (Policy S2), Homes for all & Affordable Homes (Policies H1,H2)

The National Planning Policy Framework (NPPF) requires that new residential development MUST respect the character and density of housing in the area and be limited by the availability of infrastructure and local facilities.

Object: I do believe there is a case for some low cost housing to keep some people in the village but I see no sense in re-locating those already struggling to find housing/employment in other areas of the borough and placing them in a situation which makes getting a job harder because of access to employment or transport links. I believe it could become a sink estate for people being moved out of the metropolitan area. The West Horsley Parish Council and Surrey Community Action Housing Survey (May 2014) identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish to downsize to a smaller home-which in turn would free up larger family homes and allow flow in the property market.

‘Affordable’ homes, under national definitions, mean homes that are sold or rented at 80% of market value. Even at 70% as proposed will put these homes well out of the reach of most people’s means and starter homes will still not be available to local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy H1 - Homes for all

OBJECT. Firstly, I would like to examine the reason why we need to provide so many new affordable houses. Surrey University was allowed to expand the number of students without providing sufficient accommodation on campus so that many of the affordable houses available in the surrounding area were bought up as ‘buy to let’ for students. No regard was taken for those residents who needed them in order to remain living in Guildford, their home town. The University is still expanding with the new Vet School - will more ‘affordable’ houses be bought up for student use? This expansion can only make the few affordable houses further out of reach for our children. Student houses do not pay council tax so the residents of Guildford are subsidising the landlords. If you truly wanted to keep houses in reach of key workers, you would insist that this expansion of the University does not take place without the required student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/897   Respondent: 8830049 / Peter Hooley   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Whilst the number of new homes proposed for West & East Horsley have apparently been reduced, this still leaves over 500 new homes. This remains a disproportionate increase, particularly for West Horsley of roughly a third both in terms of village character and wider infrastructure.

4) The Wisley Airfield proposal for over 2,000 homes remains and again is completely disproportionate in terms of what the local infrastructure can accommodate and what is allowable on a brownfield site. Whilst some of the old hangar and office areas may qualify as 'pre-developed land' the old airfield and supporting roadways certainly do not.

I therefore register my objection to the Proposed Submission of the Local Plan on the above grounds, namely: a faulty forecast of housing growth, no changes to the proposed withdrawal of the above villages from the Green Belt and the completely disproportionate housing development proposals at West & East Horsley and Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14741   Respondent: 8831393 / John Dumbleton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The University of Surrey should be required to build far more than 60% of accommodation for those of their students who wish to live on campus thereby relieving pressure on rented accommodation in Guildford where so many students now live. This would then release accommodation onto the open housing market. Student accommodation should be an equal priority with the development and expansion of the University itself.

In paragraph 4.2.3 the need for 242 registered care bedspaces is mentioned. On page 18 the LAA provision for 51 bedspaces at 179 Epsom Road, Merrow (LAA site 2235) is highlighted. However, on page 183 of the LAA the site is described as a vacant care home where there is a planning application for 24 dwellings which has been refused and is going to appeal. It seems more likely than not that at some stage in the future point the former Redwood Care Home will make way for residential development and the relevant document should be amended to accurately reflect the position.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16955   Respondent: 8831393 / John Dumbleton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY H1- HOMES FOR ALL

The University of Surrey should be required to build far more than 60% of accommodation for those of their students who wish to live on campus thereby relieving pressure on rented accommodation in Guildford where so many students now live. This would then release accommodation onto the open housing market. Student accommodation should be an equal priority with the development and expansion of the University itself.

In paragraph 4.2.3 the need for 242 registered care bedspaces is mentioned. On page 18 the LAA provision for 51 bedspaces at 179 Epsom Road, Merrow (LAA site 2235) is highlighted. However, on page 183 of the LAA the site is described as a vacant care home where there is a planning application for 24 dwellings which has been refused and is going to appeal. It seems more likely than not that at some stage in the future the former Redwood Care Home will make way for residential development and the relevant document should be amended to accurately reflect the position.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2214  Respondent: 8831809 / Ann Taylor  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Housing Development: the overall, cumulative impact of the Gosden Hill, Burnt Common, Garlick’s Arch and Wisley developments means that there is almost continuous urban development along this bit of the A3. In other areas of the borough, positive steps have been taken to avoid coalescence through new developments. Yet here the opposite approach is being proposed of sacrificing Green Belt land and creating a solid swathe of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1574  Respondent: 8832513 / Richard Russell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT because even though the reduction in the number of new homes proposed in the Green Belt following the 2016 Consultation is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) it simply does not go far enough in reducing the still very large number of new dwellings proposed on the Green Belt. As a consequence, the eastern side of the Borough is currently scheduled to take an even greater proportion of new homes in the Green Belt. This, despite having a revised Green Belt Policy P2 in the Local Plan, which clearly and categorically states that “The Metropolitan Green Belt will continue to be protected”.

I OBJECT because it is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, in the way that many other Councils have done by which to protect the Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes will, by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.
I OBJECT because the ‘housing needs projection’ of GL Hearn have been adopted by GBC without question or analysis for the purposes of the Local Plan and they therefore fail to take into account any of the significant constraints which limit the supply of housing across the borough: in particular the large proportion of land which currently falls within the Metropolitan Green Belt. Furthermore, they also totally fail to make appropriate allowance for the already overstretched infrastructure whereas other Local Plans across the country have sensibly adjusted their housing targets to reflect such constraints whereas GBC have elected to ignore them. This, despite having a revised Green Belt Policy P2 in the Local Plan, which clearly and categorically states that “The Metropolitan Green Belt will continue to be protected”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17403  Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1: Homes for All

Policy H1 confirms that, new residential development is required to make the most efficient use of land and that densities will vary dependent upon the local area context and character and the sustainability of the location but higher density development will be supported in Guildford town centre. The policy’s reasoned justification (at para 4.2.8) confirms that there is a responsibility to use natural resources, such as land, wisely and that efficient use of land is "essential.”

SRG supports the above, particularly given that the draft Local plan currently envisages 80% of new dwellings being delivered on 'greenfield' and/or Green Belt land (Ref: Table 1: Planned Delivery between 2018 and 2033), recognising such an approach to be consistent with the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8291  Respondent: 8835425 / Martin O’Hara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Furthermore, I SUPPORT Policy H1: Homes for all, particularly the statements under the heading Housing Mix; that states “New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location….. and under the heading Density states that “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location.”

However, if any of the five sites proposed by Policies A37, A38, A39, A40 or A41 (four in West Horsley and one in East Horsley) are ultimately to be included within the adopted Local Plan then very careful consideration should be given to the proposed density of any future developments. I would suggest that a target density of 10 homes per hectare and a maximum density of 15 homes per hectare is more appropriate for such semi-rural village locations, and certainly are more in keeping with the village’s existing character and density.
I would point out that the existing village settlement largely comprises low density housing, with a considerable mix of ages and housing styles. The number of houses proposed on each of the potential development sites in West Horsley, and thereby their densities, are completely out of character with the existing village, where a density of around 10 homes per hectare is much nearer to the norm.

West Horsley requires a balanced mix of homes to meet the community’s needs. In order to plan and preserve a thriving community it is important that housing provision is made for a broad cross-section of society young and old, rich and poor, families and single person households. West Horsley will require some smaller scale (1-2 bedroom) genuinely ‘affordable’ homes, for young people starting home ownership or independent rental, for more elderly residents who wish to have a smaller property in their retirement or once their children have left the family home or for the unfortunately increasing number of single divorcees. I believe that a significant number of the ‘affordable’ housing should be available for shared ownership, enabling younger people and families to gain an increasing foothold on the housing ladder, which they would otherwise be precluded from by the initial cost of local housing. These younger residents would however contribute significantly to the vibrancy of the local community and would ensure a balanced community of all ages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15760  Respondent: 8836129 / Roger Shapley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The requirement is to meet housing ‘need’ not to meet the SHMA total unadjusted for constraints; it fails to set any rules on important issues such as constraints and density. The SHMA is defective; consequentially Policy H1 objectives so derived are flawed.

The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so we must object. We support high density development in the urban area.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7105  Respondent: 8837313 / Maria Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT (POLICY H1 - Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SI-IMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanizing, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16212  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of ‘regulatory capture’ by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/13419  Respondent: 8840033 / Jimmy Daboo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. This is another serious flaw in the plan.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. This would have many benefits to Guildford itself.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2316  Respondent: 8840161 / Richard Ayears  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strongly to the deletion of para 4.2.8 on housing density. There must be an efficient use of land in keeping with the local area. It is notable than the development planned for the town centre is at a lower density than that at site A35 for example and this is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Policy H1: Homes for all

3.1. I OBJECT to this policy for the following reasons:

3.1.1. It puts building homes as a higher priority than (a) preserving the Green Belt and (b) making attempts to reduce the growth that feeds the need for new housing.

3.1.2. In the specific case of West Horsley, the numbers of houses proposed are not required, as is proven by the 2014 Housing Survey carried out by West Horsley Parish Council which identified only about 20 affordable homes being required for local people who want to remain in the village.

3.1.3. In the specific case of West Horsley, the proposed housing densities are much higher than the existing layout.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### I OBJECT to the fact that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done to protect the Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

### I object to policy H1: Homes for all. Like many of the policies in the plan the “the blue boxes” do not provide a practial framework for decision making. It fails to set any rules on important issues such as constraints and density, and is not...
specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 6/10 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area in line with other university towns and not in line with just what the University of Surrey wants which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/412</th>
<th>Respondent: 8845729 / John.P Burge</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Consultants have misused official data to justify proposals for a 22% increase in housing stock in the Borough. This is far above ONS population growth projections and imposes a grossly unfair burden on those areas that are targeted to absorb such additional housing.</td>
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<td>I OBJECT to these housing targets.</td>
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<th>Comment ID: PSLPP16/4093</th>
<th>Respondent: 8846177 / Moira Tailby</th>
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<td>The economic situation has been radically changed by the Brexit vote. Slower economic growth is expected. The preposterous excessive proposed increase in the housing stock in West and East Horsley needs to be reconsidered. In this area where house prices are high, building more houses would simply attract the wealthy to a very desirable area, and not help in the least to alleviate the problem of a shortage of affordable housing. Affordable housing should be located near the available jobs.</td>
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<td>Whilst development on a modest and reasonable scale would be welcome to expand the Horsleys in a ‘natural’ manner, the proposed Guildford Local Plan is not acceptable in its present form.</td>
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<td>Please note my objection.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: PSLPP16/1929  Respondent: 8848033 / Paul Gerrard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

4.2.8 Wouldn't it be more secure to specify some density limits or ranges (unless this is planned for Part 2 of the Local Plan)? The lack of precision will surely leave the Council completely open to challenge/appeal from developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/2239  Respondent: 8848033 / Paul Gerrard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Students. Why is University of Surrey only expected to provide 60% of accommodation? They can and should provide much more. As far as I'm aware, they already have the land and permissions to do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp171/911  Respondent: 8848033 / Paul Gerrard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Specialist accommodation.

“The provision of … is encouraged”.

I object. Encouraged by whom? Why has this sentence been weakened and made passive – much like many changes in this revised document? The Council is supposed to be actively setting a policy and being responsible for it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Make this and other sentences active rather than passive to avoid legal ambiguity.

Comment ID: pslp171/912  Respondent: 8848033 / Paul Gerrard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Student accomodations

I object. The percentage has now been weakened to “about 60%”! The university can and should provide much more. As far as I can see, they already have land and permissions to do this.

“About 60% … are encouraged”.

Again sentence weakened and made passive – why?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Specify a higher target for accommodation provided by University of Surrey.
Make sentences active rather than passive to avoid legal ambiguity.

Attached documents:

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Comment ID: PSLPP16/3185  Respondent: 8850433 / Ian Doherty  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the general policy statements made in this policy, my main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13312  Respondent: 8850945 / Richard Bayes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. HOUSING POLICIES

POLICY H1: Homes for all

I support the general policy statements which are mostly repeating NPPF policies. My main concerns, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1530  Respondent: 8850977 / Sam Pinder  Agent:
The number of houses proposed, which has been slightly reduced, has been calculated based on a methodology that has not been made public. In the current climate of transparency, localism and consultation, I cannot see how it is acceptable or legal for the housing calculation to be kept secret and residents be asked to embrace a plan that they have no way of knowing is based on accurate and sensible housing calculations. Even more disturbingly, two independent studies conducted on housing numbers have found the numbers used by GBC to be a significant overestimate and suggest that housing number proposals should be significantly lower than the numbers that GBC are proposing. I am disappointed that GBC has been allowed to take this plan so far, with such flawed assumptions, at such a cost to residents at this time of such pressure on budgets, and trust that the independent inspector will properly scrutinise the plans and require the assumptions to be disclosed, leading to lower housing numbers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12851</th>
<th>Respondent: 8851233 / Helen Bayes</th>
<th>Agent:</th>
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<tr>
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<td>POLICY H1: Homes for all</td>
<td>I support the general policy statements which are mostly repeating NPPF policies. <strong>My main concerns, are primarily with the scale of new housing being proposed.</strong></td>
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<th>Comment ID: pslp171/1382</th>
<th>Respondent: 8854785 / Desmond McCann</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>11. I object the change in policy on affordable homes (Policy 4.2.23)</td>
<td>The previous version of the plan stated that &quot;Developers will be expected to provide land for affordable homes at nil value&quot;</td>
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<td>The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.&quot; So the developer doesn't even have to provide any 'affordable' homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these 'affordable' homes.</td>
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</table>
Furthermore, the 2016 Plan used to state (section 4.2.40) "In general, a need to make profit over and above the standard developers profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1798  Respondent:  8855201 / Catherine Harding  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Guildford’s proposal for more than 12426 new homes, plus an extra 1115 new homes, will result in unnecessary loss of the greenbelt and the green open character of the borough. This, and the increased congestion, cannot be justified. Any benefits to be gained from this building work will not outweigh the harm it will cause to the environment. In any case, it has been established that an unmet need does not provide the very special circumstances that would allow housing to be built in the greenbelt; Brandon Lewis has stated (in 2014) “that the position of the Secretary of State is that building on greenbelt, whether for traveller sites or conventional housing, is unlikely to outweigh harm to the greenbelt and other harm to constitute the very special circumstances justifying inappropriate developments in the greenbelt. He also said that the Secretary of State wants this point to be re-emphasised to planning authorities and planning inspectors as a material consideration in their planning decisions”[1] [1].

University Accommodation

Additional accommodation for students could be provided on campus. If 80% rather than 60% of the accommodation needed by students was available on campus more homes would be made available in Guildford quickly as students move away from them. This would make it unnecessary to build so many new homes.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10608  Respondent:  8855969 / Jonathan Murphy  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

1. I OBJECT (POLICY H1 -Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan peri It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17761  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 5-6 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students and approx. 270 Staff Houses or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
7 POLICY H1 HOMES FOR ALL

7.1 I object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

7.2 I object to the change by way of deletion of the paragraph on density: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

7.3 This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

7.4 I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

7.5 I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.”

7.6 The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on Blackwell Farm at the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

7.7 I object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

7.8 I object in particular to the inclusion of Travelling Showpeople pitches at Blackwell Farm and at Garlicks Arch where there is no proven need.

7.9 I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration
of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials."

7.10 To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to this policy

The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so I must object overall. I support high density development in the urban area. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

5. I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.”

6. The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

7. I object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

8. I object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need.

9. I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

10. To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14851  Respondent: 8865985 / Grant Ringshaw  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by...
Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1358  
Respondent: 8875233 / Richard Hiam  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7651  
Respondent: 8875457 / Mark Ground  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
13. I OBJECT (POLICY H1 -Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The consultation document is flawed in that it does not set out what assumptions have been used to calculate the housing need. Nor does it review the currently available capacity for providing additional housing from (a) brownfield sites, (b) empty properties (c) use of sites where planning permission has already been granted but development has not begun. It is therefore not possible to establish how many additional homes are really needed. The council should review the likely impact of the UK leaving the EU which is predicted to have a significant effect on jobs in London and therefore on housing needs in commuter towns in the South East including Guildford and surrounding villages.

I particularly support the aim of providing housing for the elderly; this needs to be close to facilities in the centre of villages and towns, thereby releasing other properties for family use and is preferable to the development of high density family homes. Based on my local experience, provision for the elderly is likely to have been underestimated. However, planning policy and decisions to date have shown little evidence that this is a real priority for Guildford Borough Council. Take for example the relatively recently permissions to build several properties in Station Approach in East Horsley on a site previously occupied by a single dwelling. This development featured on a national television property programme and revealed the property prices and the approximately £2m profit made by the purchaser/developer. That site was ideal for the provision of affordable homes especially for more elderly residents as it is right in the village centre, very close to shops, surgery, station and bus stop, so why was there no condition to build accordingly? The properties now built and sold are not suitable for the elderly and with a price tag of £650k for a small semidetached house with virtually no garden, are not affordable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. Settlement Areas and Extent and Nature of Housing Need

I object to the number and location of houses to be built in the borough and in West Horsley in particular; 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. It is noted and welcomed that the number of houses proposed for East and West Horsley has been reduced but the reduction does not go nearly far enough. The impact on the Green Belt, on the character of the villages and on local infrastructure remains unacceptable.

The proposals still recommend development sites on the outlying boundaries of the West Horsley village so they will inevitably increase the need for use of car(s) even for facilities in the village. Sustainability has not been addressed. The idea of a shuttle bus to the station from any development in Wisley is clearly impractical and obviously so for anyone who is familiar with the location of, and access to Horsley station or Effingham Junction station. This is paying lip service to sustainability.

Unlike other councils, GBC has not attempted to limit its growth to protect the Green Belt and the projected growth of 25% if the plan is adopted is at least double the estimate of what might be needed set out by the Office for National
Statistics. The scale of development is therefore without justification and the assumptions used by GBC for their projected need remain unexplained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7164  Respondent: 8881345 / Lynne Ground  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11590  Respondent: 8881537 / Jean Baptist  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLP16/5757  **Respondent:** 8883841 / Pamela French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

13. **I OBJECT** Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The reduction in the number of new homes proposed within the Green Belt, following the 2016 Consultation, does not go far enough in reducing the very large number of new dwellings proposed on the Green Belt. This will result in the needless loss of Green Belt, thus contradicting the Government’s National Planning Policy Framework, published in March 2012, which states in Section 9, point 79 “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land open; the essential characteristics of Green Belts are their openness and their permanence.” and in point 82 “The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example, when planning for larger scale development such as new settlements or major urban extensions.” Despite claims that it will continue to protect the Metropolitan Green Belt, Guildford Borough Council still proposes to remove large areas of the Green Belt for development.

It is totally unacceptable that Guildford Borough Council is choosing not to constrain its overall housing growth to protect the Green Belt, as many other Councils have done, and continues to rely upon flawed evidence to justify over-expansion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

There appears to be little connection between the statements “to uphold the character of the Borough” with the proposed removal of the villages to the North East of the Borough from the Green Belt. West Horsley, one of the most rural parishes is taken out of the Green Belt and the boundary of the village expanded to include land owned by developers and property companies. on this land nearly three hundred houses are to be built. No consideration has been given to the totally inadequate infrastructure for such a massive increase in dwellings. Historically villages have grown gradually. I doubt that many would complain if the villages gradually became more densely populated as a result of infilling or development of derelict land, but the these proposals negate any sensible growth.

The proposals seem totally lacking in sympathy with the rural nature of the area from Burpham, Merrow through the Clandons, to the Horsleys, Ockham and Effingham.

Once the villages are out of the Green Belt developers will have a field day. The council, even if they see the error of their ways will be unable to stop the steady destruction of our villages as we know them. The council i.e. the payers of council tax, do not have the resources to compete against property developers; within a generation this area of Surrey will be unrecognisable.

As many will have pointed out, it is deceitful for a political party to say it will not build on green belt land and then, after people who have voted on this promise, for a council to alter the green belt boundaries without proper discussion or justification.

There are proposals to build two large scale developments a total of well over 4000 homes on the south east side of the A3 less than six miles apart. At a minimum an extra 9000 people focusing on the Royal Surrey. The traffic chaos is mind boggling. The only explanation I can find in the draft plan is that the Guildford Borough Council wants to expand the
town. The Borough is already overpopulated. If this is London overspill the locals should be informed. London actually has many potential sites.

The best homes are those near a person’s place of work. Such an arrangement saves cost and stress to the worker and protects the environment. At present work places, namely to the west, are in completely different places from the sites suggested for housing.

The Council appear to be carried away with grandiose schemes that bear little relationship to the stressful lives already experienced by many local people.

Houses are needed but so is common sense.

There are frequent calls to build on the green built, these need to be thought about carefully and properly justified they are not in this plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/9319  Respondent: 8892737 / David Eagle  Agent:  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1  
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**  

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  
**Attached documents:**

---

Comment ID: PSLPP16/16962  Respondent: 8893057 / Dianne Garnett  Agent:  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1  
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**  

1.1 **We object** to policy H1 Homes for all.

1.2 Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
1.3 The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. 1.4 We support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 5-6 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

1.5 Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

1.6 Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14749  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1: Homes for all

I OBJECT to this policy for the following reasons:

It puts building homes as a higher priority than (a) preserving the Green Belt and (b) making attempts to reduce the growth that feeds the need for new housing.

In the specific case of West Horsley, the numbers of houses proposed are not required, as is proven by the 2014 Housing Survey carried out by West Horsley Parish Council which identified only about 20 affordable homes being required for local people who want to remain in the village.

In the specific case of West Horsley, the proposed housing densities are much higher than the existing layout.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1025  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Student accommodation needs to be built on campus - using the permissions granted years ago to the University. It is up to the Council to push for this. Houses in the town would then be freed for young families who need them.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8040  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4258  Respondent: 8900705 / Susan Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4119  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

12. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1624  Respondent: 8901729 / Justin Underwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Homes For all/ Affordable Homes

We don’t have the roads/parking for this increase in traffic, the school is already full to brimming. There is no evidence that we need this many new homes, our own west Horsley survey showed we need 20 properties for local people who want to remain in village (downsizes/ young people). 434 homes in 3 greenbelt sites at much higher densities than currently exist would be totally out of character with existing mix.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4087  Respondent: 8901761 / Michael and Ceril Brooke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. In addition these numbers are based on growth and demographic data now invalidated by BREXIT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8148  Respondent: 8902465 / Linda Slater  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL):

• Policy doesn’t set any constraints on building.
• Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16949  
Respondent: 8902689 / Lyndell Mussell  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

UNIVERSITY, COLLEGE AND STUDENT ACCOMMODATION

The University and other colleges may be excellent and do provide employment, but the accommodation of student population within the community, particularly in west Guildford, has not been generally acceptable to local residents. The students are not part of the community and some subject residents to high levels of noise and unacceptable behaviour. To allow the University and other colleges to expand further, can only cause further problems. In addition, the development of internet education courses may reduce the demand for student attendance at Universities, which could limited University development in the near future. I understand that the Surrey University own the land around Blackwell farm and wish to sell it for housing. Perhaps they may reconsider this strategy and preserve this area for the enjoyment of the residents of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18529  
Respondent: 8903265 / Susan Anderson  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students
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<tr>
<th>Comment ID: pslp171/781</th>
<th>Respondent: 8903745 / Peter Davis</th>
<th>Agent:</th>
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<td>Document:</td>
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<td>The current forecast for population increase for the plan period is 10.4% and yet GBC plan to increase housing stock by 22%. There is no justification for this over provision of housing stock indeed given our imminent exit from the European Community and subsequent reduction in people coming to the UK the forecast of 10.4% will need to be revised downwards.</td>
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<td>In excess of 55% of new housing in the local plan is on land currently Green Belt. Green Belt was specifically introduced to prevent over development of housing and ensure that there is sufficient natural countryside between developments. I wholly oppose building on the Green Belt, which must surely be illegal, and strongly believe that as movement of the Green Belt boundary is a very major act it must be subject to a vote by the local population.</td>
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<th>Comment ID: PSLPP16/15044</th>
<th>Respondent: 8904129 / Elizabeth Ross</th>
<th>Agent:</th>
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<th>Comment ID: PSLPP16/4194</th>
<th>Respondent: 8904673 / Colin Burnside</th>
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### Comment ID: PSLPP16/15079  Respondent: 8905537 / Christopher Ross  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

### Comment ID: PSLPP16/14999  Respondent: 8906273 / G Baptist  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Comment ID: PSLPP16/9487  Respondent: 8908193 / David Wyatt  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The University of Surrey must complete their previous 2003 agreement to build student and staff accommodation within its campus (in excess of 3,000 outstanding to date) before any further increase in student numbers are allowed to have an impact on the housing requirement in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2772  Respondent: 8908513 / Burpham Community Association (Liz Critchfield)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Another aspect of the housing issue that gives cause for concern is the proposal that only 60% of full time University students will accommodated on campus; this puts increased pressure on houses in the town. Other universities, Oxford for example, have higher targets than those proposed. A more realistic target of 80%, which Surrey University could meet by using its existing planning permissions, would help by freeing up affordable homes in the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18434  Respondent: 8909761 / Diana Grover  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/12054  **Respondent:** 8914945 / Nichola Armstrong  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy H1/Policy H2**

This Plan is pro ‘growth’ and does not objectively assess the ‘need’ of rural villages in the greenbelt, the urban areas or the town centre. How can homes for all be considered when the SHMA has not been scrutinised or evaluated. The housing numbers are staggeringly high in comparison to other borough councils. GBC already have the highest proportion of traveller sites than any other borough council especially west of the borough. A46 has been chosen to allocate all of the borough’s showman sites. A47 proposes to make a temporary license permanent so adding another 6 traveller site to the west of the borough.

Guildford has always been expensive and unaffordable. The University of Surrey has never built the student accommodation to alleviate pressure from rented accommodation around Guildford.

**I object to Policy H1/Policy H2.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/9447  **Respondent:** 8915073 / Alastair Lawson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

This Plan is pro ‘growth’ and does not objectively assess the ‘need’ of rural villages in the greenbelt, the urban areas or the town centre. How can homes for all be considered when the SHMA has not been scrutinised or evaluated. The housing numbers are staggering in comparison to other borough councils. GBC already have the highest proportion of traveller sites than any other borough council especially west of the borough. A46 has been chosen to allocate all of the borough’s showman sites. A47 proposes to make a temporary license permanent so adding another 6 traveller site to the west of the borough.

Guildford has always been expensive and unaffordable. The University of Surrey has never built the student accommodation to alleviate pressure from rented accommodation around Guildford.

**I object to Policy H1/Policy H2.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I agree that there should be provision for all. But not at any cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16395  Respondent: 8915905 / Rhiannon Stroud  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy H1 (Homes for All)

This policy fails to require that the University of Surrey makes use of the planning permissions that it already has in place to build student accommodation on existing space. If the University was obliged to provide 100% of the accommodation for its new students and 60% for existing students then a lot of housing would become available within the town centre. Where there is existing University owned land that has planning permission for development, there should be a requirement for this to be used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9519  Respondent: 8918657 / Tim Handley  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to Policy H1 (HOMES FOR ALL) on the grounds that the Policy doesn’t set any constraints on building and the housing mix has been based on pre-Brexit growth and demographic assumptions which are now unproven and should be subject to review.

The draft Local Plan has failed to compel the University of Surrey to use its many planning consents and existing space, such as car parks, to provide required student accommodation. If the University were made to take responsibility for accommodating its students on the land which it already owns but fails to efficiently utilise, this would free up housing stock within the City to be utilised to answer any housing requirements identified by the Local Plan.

The proposals for development contained in the Local Plan impose a disproportionate amount (the majority) in Green Belt land and provides too few new homes in urban areas such as Guildford city centre where transport links are better and work opportunities are greater facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13236  Respondent: 8919009 / Andrew Kukielka  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

I also object to Policy H1 (HOMES FOR ALL) on the grounds that the Policy doesn’t set any constraints on building and the housing mix has been based on pre-Brexit growth and demographic assumptions which are now unproven and should be subject to review.

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/3521  Respondent: 8919521 / Susan Hughes  Agent: | Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| POLICY H1 – Homes for all OBJECT. Again I challenge the scale of new building being proposed. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: pslp171/1890  Respondent: 8919873 / Amy Barklam  Agent: | Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
Housing Number

I object to the housing number and particularly the fact that the Council has not, as required, used any constraints such as green belt, infrastructure, air quality, AONB, etc. I believe that the housing number is unsound and open to legal challenge. I also object to the inclusion of a 10% buffer in the housing number as I am advised that this is unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2360  Respondent: 8920865 / Glen Travers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

VIII. I object to the inclusion of a 10% buffer in the housing number over the plan period as I are advised by counsel that this is unnecessary.
IX. I object to the housing number and in particular the fact that the Council have not, as required, used any constraints such as green belt, infrastructure, AONB, air quality, TBHSPA etc. II believe that the housing number is open to legal challenge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11990  Respondent: 8921377 / Paul Maycox  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2152  Respondent: 8921793 / Graham Richings  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the added wording “at least” to the housing number of 12,426. This is open ended and could for instance lead to serious development in areas like the Hog’s Back and other Green Belt Land. There should be a maximum number and not an open ended number. Bearing in mind that the new housing needs figure has now been changed at least three times casting doubt on how reliable the calculations and methodology that has been used is. I believe that the housing need figures are far too high. We need to know how they have been arrived at. It appears that GBC do not have or know what these calculations are. This shows a serious lack of leadership and incompetence. They flatly refuse to tell the public how the house needs figures have been arrived at. It also possible and likely that the National Audit Office figures on which some of the calculations were based was wrong. This is just another case of senior people in the Council not listening to local tax payers and not being concerned about future consequences. Look at what happened in respect of Grenfell Tower. They did not listen to concerns. Similarly we could see a disaster occurring to our Green Belt and countryside in the future. GBC should make public how their housing need figures have been arrived at. We cannot comment in any meaningful way without that information.

In the same area of the plan I am concerned at the housing numbers as amended. 13,860 have been reduced to 12,426. I am highly suspicious of these figures. This is the third time that these and other figures have changed. How were the calculations got so wrong in the first place? Physically nothing has changed. That being the case there was either human error (misjudgement) or the wrong formula was used. Or it was some bargaining stance? How can we trust the current figures which seem far too high and when a lot of the reasoning seems to be done on wishful thinking. I think that I am right in saying that the Blackwell Farm figure was near 3,000 originally and now well down from that! Unless GBC make it known to us all how the housing needs figures were arrived at we can have little faith in the housing need figures. There is clearly physically room for 3,000 or more houses and the way things are the current above figure could be increased down the road.

In the same area of the Plan I can see no reason whatsoever to extent the Research Park onto Blackwell Farm. There seems to be a housing need, although not proved. We do not need more commercial property on Green Belt Land. Houses?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13234  Respondent: 8921857 / Claire Kukielka  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10986  Respondent: 8926401 / Christine Medlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1 - Homes for all (and 4.2.8)
A commitment is needed to set (in following SPDs) guideline maximum dwelling densities for all areas, together with identification of those areas, such as Charlottesville, where no increase in dwelling numbers will be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15134  Respondent: 8926529 / Annie Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not done so. Freeing up private housing in the town currently used for student
accommodation would provide affordable housing for local people. A new development at Blackwell Farm (2,000 houses) providing accommodation, including student accommodation, is a selfish move by the university.

After the 1st World War 'Homes for Heros' were provided countrywide, as was the case for council housing after the 2nd World War. I believe GBC should adopt the same strategy, even in areas of AONB albeit on a reduced scale, to provide sustainable homes borough-wide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11715  Respondent: 8928033 / P. Richardson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11716  Respondent: 8928033 / P. Richardson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Gosden Hill developement being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11941</th>
<th>Respondent: 8928289 / Trevor Skerritt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16996  **Respondent:** 8928961 / Sue Reeve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I strongly object to the fact that the university is not providing accommodation for more of its student body and staff.

In the 2003 Local Plan the university was granted special permission to build student and staff housing on land at Manor Farm by taking it out of the Green Belt so that the university could keep a promise to build 4,790 residences to cope with its growing student population. These were considered exceptional circumstances and this planning permission was given for development on Green Belt land. Student growth accounts for 50% of the recent growth of the population of Guildford Borough. The university has instead chosen to build less than a quarter of the housing promised and we are told the University wants to expand further the number of students and has shown no intention of building the number of dwellings promised. The university should be made to act responsibly and provide suitable accommodation for its student body thus releasing valuable housing stock for all our key workers and their families in the Borough.

Why did not GUILDFORD BOROUGH COUNCIL make sure that this accommodation was built as it was supposed to have been?

It is clear from the Government guidance that student accommodation can be counted towards calculating local housing need and not over inflate our apparent need. Has this been done?

GUILDFORD BOROUGH COUNCIL seems to have used and unrealistically low figure for windfall housing – almost half of what actually has been gained over recent years.

It seems to me that if all the rules were applied as they should be and numbers calculated properly our housing need would be much reduced and in turn stop the development on our precious Green Belt.

It is a fact that any houses built in our area will be snapped up by people wishing to move out of London because they can get better value for money in this area, even though property prices are extremely high. This however is not a housing need.
Guildford Borough does not need a huge influx of people. We have a stable jobs market, with low unemployment. Why has GUILDFORD BOROUGH COUNCIL not argued the fact that the South East is already full to bursting? What is this obsession with attracting more and more people to the area?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/58  **Respondent:** 8929057 / East Horsley Parish Council (Nick Clemens)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **HOUSING POLICIES**

This section provides comments on the housing policies set out in the Proposed Submission Local Plan.

**POLICY H1: Homes for all**

We support the general policy statements made in this policy, which are mostly repeating NPPF polices. Our main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4461  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey
University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2284  Respondent: 8930305 / Elaine Best  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The draft plan relies heavily of the figures set out in the SHMA. The validity of these figures is strongly challenged and disputed. I therefore object to the numbers of dwellings that the SHMA sets out and consider any decisions taken by the Borough Council relying upon such figures to be fundamentally flawed. The latest figure of circa 295 in West Horsley alone is too many and I object to such a high number.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8756  Respondent: 8933185 / Peter See  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.2.5 Policy H I Homes for All including the: including prevailing built form: design of existing buildings in the area

4.2.8 Density

Add:

People in houses need gardens, especially children who need gardens large enough in which to play.

It is important that houses have their own driveway, where cars can be parked securely, within the gardens of homes where windows overlook parked vehicles. Garages are often used just for storage of various items rather than the parking of cars. So driveways are needed too. Without driveways, there are often problems involving safety/obstruction/ neighbour disputes/parking on verges etc. Visitors need to park in (driveways, as well as residents. Elderly people, in
particular, need their car to be close to their house. It is not always possible to provide a suitable parking bay, on a road, for a person who has disabilities.

4.2.20 Travellers

Repeat suggested text shown under heading ’Policy S2’ on page 5 of this letter.

4.2.26 Houses in Multiple Occupation less: fewer

Page 37 Monitoring Indicators

applications applications for student: applications for student

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/31  Respondent: 8933185 / Peter See  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.2.5 Policy H1 Homes for All

including the: including

prevailing built form: design of existing buildings in the area

Although built form are words used by planners, these words look like jargon. The Local Plan will be read by many people who are not planners.

4.2.20 Gypsy, Traveller and Travelling Showpeople

You have added text which includes the words “New pitches and plots should have….parking...”. These words appear to be appropriate in the Local Plan. But, in view of the importance of parking and the need for consistency, you should include the need for homes to have driveways in Policy ID3 on page 129.

4.2.27d Self-build and Custom Housebuilding

Although 'flatted developments' may be a term used by planners, it would be more elegant to say developments of flats, bearing in mind that many non-planners will read the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.2.5 Policy H1 Homes for All

including the: including

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<tr>
<th>Comment ID: pslp171/823</th>
<th>Respondent: 8933537 / Annie Ladd</th>
<th>Agent:</th>
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The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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<th>Respondent: 8938881 / Ann Cook</th>
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Policy H1 HOMES FOR ALL

The general notion of 'Homes for all' is a laudable ambition. However it would seem that there is a particular need in the borough for cheaper homes and for homes for down-sizers. In a generally affluent borough such as Guildford, proposals need to be generally targeted at providing homes needed by local people rather than large establishments attracting more commuters to our over crowded rail networks. The aim should therefore be not to pursue a 'one size fits all policy' but to target development to need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17129  Respondent: 8940225 / Glen Ruddy  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16034  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Overall the use of language is weak and ineffective. Use of words such as “should” allow too much wriggle room for developers, coupled with the presumption for development. Why does the policy not use the word “must” to avoid doubt?

We agree and support the part of the policy that says that development should provide a mix of housing types and sizes appropriate to the site size, characteristics and location.

We also agree that residential densities should reflect the local area context, character and sustainability.

We object to the figure of 60% of students being housed on campus. The university has failed so far to meet its commitments as far as students on campus are concerned and some leading universities operate a much higher percentage of students on campus. Releasing HMO dwellings into the housing pool would alleviate the pressures elsewhere and reduce traffic to and from the university. There is no specific monitoring of this figure other than planning applications. Bearing in mind the past performance of the university in terms of non-delivery of planning permissions, surely it is possible to monitor the percentage of students on campus?

We support the proposed restrictions on the granting of HMO planning permission, although stress that the need for sufficient amenity space should explicitly require parking space. Parts of Guildford are being turned into untidy car parks, with vehicles parked on pavements and illegally parked in restricted zones. This council must remember that HMOs usually mean multiple cars as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/17585  **Respondent:** 8944737 / Martin Grant Homes (Martin Grant Homes)  **Agent:** Barton Willmore (Michael Knott)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

5.1 We support Policy H1 insofar as it does not seek to adopt a rigid application of the SHMA in securing a mix of new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2733  **Respondent:** 8944929 / A Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

18. I object strongly to the deletion of para 4.2.8 on housing density. There must be an efficient use of land in keeping with the local area. It is notable than the development planned for the town centre is at a lower density than that at site A35 for example and this is totally unacceptable.

19. I object to the wording of 4.2.18 which is unenforceable. Throughout the plan the word “Expect” needs to be replaced by “require”
20. Likewise, I object to the use of the word “resist” in 4.2.24 – it should be replaced by “refused” in this para and throughout the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/12626</th>
<th>Respondent: 8945441 / Hazel A. Jarvis</th>
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<th>Respondent: 8945793 / Helen Bell</th>
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<td>The majority of private houses rented in Guildford are to University students. If these were reclaimed then there would be a considerable number of houses available for private occupation. Why has the University not fulfilled its obligations and provided sufficient student and staff accommodation on campus for which planning permission was granted a long time ago?</td>
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I OBJECT. The housing mix was based on a flawed SHMA that has not been scrutinised or evaluated. The policy fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy H1: Homes for all

I OBJECT to the deletion of the paragraph on density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Density
The paragraphs relating to density have been deleted from Policy H1. The density in urban areas needs to be maximised to make optimum use of land taken for development. There must be a policy to cover minimum and maximum density to ensure optimum use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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This letter is a direct objection to the 2017 house building plans in the Ashgreen, Ash and Tongham area. We understand the need for new housing within these areas; unfortunately the numbers proposed are monstrous.

This is also a letter of rejection to the moving of the Ashgreen boundary just to incorporate the council quota in new builds in the Ash- Tongham boundary. The use of Ashgreen just to make the council house building plan add up is frankly comical. Ash, Tongham and Ashgreen are all separate communities and do not need to be merged just to serve the council or governments planning requirements.

Ashgreen is regarded by all un-sundry as a beautiful rural part of this area, with buildings of Historical importance as well as areas of natural beauty .Ash Manor, a historical farmstead of three listed buildings including a medieval hall house. Ashgreen has not neglected the need for new housing. The main requirement for any expansion of Ashgreen is the fact that any building work undertaken is moderate and within the keeping and character of the area.

The four main objections to the council housing plans are;

- The number of houses proposed.
- The moving of the boundary to accommodate the council numbers.
- The lack of any plans regarding the infrastructure such as roads, schools, and other amenities required to make a housing project of this size safe, viable and of benefit to the present community.
- The Flooding. This could be an issue .The residents of Ashgreen already deal with huge amounts of coming of the A31 the Hogs Back. Recently a bund has been constructed to relieve any flow of water from the hills looking down on Ashgreen. New builds in great numbers and in areas surrounding Ashgreen could in future have a detrimental effect on the houses and surroundings of Ashgreen.

So these are our four main reasons for opposing the build.

Point 1

A suicidal number 1750 of houses being built in and around one of the busiest transport hubs in the South of England. Access to the A31 -331-A3-M25 and M3are all heavily congested and frequently at a standstill due to accidents and the volume of traffic. So traffic from these main roads will regularly use White lane, Foreman Road and Ashgreen road which are narrow roads, without foot paths and are used for a cut through to get towards Guildford Hospital etc. This could be an additional 3700 cars on these rural roads and would be dangerous and very unsafe.

Point 2

We have a deep contempt to the council’s underhand movement of the boundary that they can justify to the government that the planning proposals for this area are on track this is scandalous.

Point 3
To build the number of houses proposed and with no plans for the infrastructure within this area we feel is crazy. All the main roads are heavy with traffic virtually every day from early in the morning. You plan to build in an area where of all roads leading to the main transport links are totally unsuitable for purpose. The roads in and around Ashgreen are narrow mostly without footpaths and are also used by cyclists, walkers and horse riders. Placing such a large number of new homes in an area with already overloaded roads, a lack of schools, surgeries and other important amenities is a recipe for disaster with no planning of any kind for the infrastructure.

Point 4

We live in Drovers Way Ashgreen we have been here thirteen years our garden is never dry even at the hottest time of the year we feel the building of so many houses could cause a problem with the natural flow of water coming of the hogs back. The building of so many houses could lead to areas of Ashgreen having problems with flooding because the water cannot run its natural course. The Ashgreen bund has recently been built to alleviate any potential flooding problems so why would you want to build so many houses with the possibility of causing potential flooding problems.

Our Conclusion

The high number of new houses proposed for the Ashgreen ,Ash and Tongham are totally unreasonable because of some of the points highlighted in this letter. As we understand things there are no proposals for building in Normandy why? This is an unjust and unfair plan by the council to destroy the lives liveyhoods and a reasonable way of life in ASHGREEN, ASH AND TONGHAM.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17296  Respondent: 8967233 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Luke Vallins)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The University welcomes and supports much of the content of this policy, but strongly objects to the specific wording regarding student housing which it regards as being discriminatory.

The intention to provide homes for all is welcomed and supported. The University notes that this includes all sectors and age ranges of society, including students.

The University also supports the provision of a mix of housing, with a wide choice of homes. It would add that this wide choice should be available to all, including students, who are not a homogeneous group and just as every other segment of society have different needs.

The University generally supports the principles set out with respect to density, including making best use of land and variation of density dependent on local context, character and sustainability of the location.

However, the University strongly objects to the part of the policy that addresses student housing, specifically the expectation that 60 per cent of the University’s eligible student population (full time equivalent students) should be provided with student bedspaces and accommodation on campus.

First of all there is a need for care in the use of terminology in the phrase “eligible student population (full time equivalent)”. The “eligible student population” is not the same as the “full time equivalent” student population. The term “eligible students” is a working definition that the University has previously used in the context of the Local Plan to estimate those students likely to require accommodation in the borough as a direct result of their studies. This therefore
excludes students such as part-time students, distance learning students, students on industrial placements, students who commute and students who may be living in the family home. All these students will be included in the full time equivalent number.

In addition, it should be noted that the University already provides and has planning permission for a large number of student residences in Guildford on its sites at Stag Hill, Manor Park and Hazel Farm. There are about 7,100 student beds; those that are either already built and in use (5,100) or committed through planning permissions (about another 2,000, depending on detailed planning).

The University is making a significant contribution to meeting its student housing needs, with about 48% of full time Guildford-based students currently in University-owned accommodation. Relative to other towns with universities, Guildford is underserved by Purpose Built Student Accommodation not owned or controlled by the University and this is regarded by the University as an area where some collective focus needs to be placed.

The proportion of full time Guildford-based students in University accommodation varies year to year as the student cohort changes, and the supply of accommodation also changes.

It should be noted that the University already provides for more accommodation on its land for its students than do 95% of all other higher education institutions, including small specialist institutions.

Against this very favourable background, it is therefore not clear why the reason is for the proposed wording as part of Policy H1, nor how this element of the policy would be operated in practice. The wording in the policy reads as an aspirational statement (i.e. that a minimum of 60% of eligible students should be provided with accommodation on campus) without any context regarding how this could practically be achieved, assessed or monitored. This aspiration is not a policy, and hence has no place in Policy H1. This aspiration is also discriminatory against the University and against students.

The University recognises that there is a desire to see as many students as possible in purpose built student accommodation rather than in shared houses in the residential areas of the town. Nevertheless, it is important to take into account that University students have the same rights as any other member of the public and the University cannot compel them to live in its accommodation. Similarly, the University cannot reasonably be expected to build on campus accommodation beyond the actual demand from its students. The University believes and evidence suggests that the real demand for on campus accommodation lies between 50% and 55% of full time Guildford-based students.

Whilst the University itself seeks to provide accommodation for between 50 and 60% of its full time Guildford-based students this is not considered to be a binding target and the exact figure will go up and down depending on fluctuations in the number and type of these students and the number of available rooms year on year.

Indeed the University considers that there is a point around 55% of the full time Guildford based student number at which on campus accommodation might suffer increased vacancy rates with very severe implications for the financial sustainability of the University. This is because living in shared houses in established residential areas will always be attractive to a large part of the student body irrespective of the number of rooms available on campus. Over-provision of rooms on campus to the extent that vacancy rates in the University’ s accommodation rise is inefficient use of land and investment, and should be avoided.

The University notes that there are also other ways in which purpose built student accommodation can be provided, other than directly by the University on its campus, or by the private rental sector in shared houses.

There are opportunities for independent student housing providers to provide purpose built accommodation for students in locations away from the campus, such as the town centre. This in turn provides another and different type of accommodation, with the advantages of bespoke student accommodation but away from campus and close to town centre facilities and amenities. This is a very small part of the Guildford context at the moment, but should increasingly become a factor in the future.

The University notes that the Council has granted permission for such development in the town centre. In the context of the night time economy and introducing vitality to the town centre, there is a case for more such accommodation as part
of the development mix in the town centre. This also attracts students away from more traditional suburban residential
neighbourhoods with family housing. This is what happens in many other university towns and cities in the UK.

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

Taking all of the above into account, the University suggests that the H1 policy text under the heading “Students” be
deleted and replaced with:

“The provision of new purpose built student accommodation is encouraged and should be located on, or close to, the
University Campus or sites of other higher education institutions, or in the Town Centre.”

This approach ensures that the policy makes provision for student accommodation, does not discriminate according to
where the students are studying, encourages developers of purpose built accommodation to consider sites in sustainable
locations with good accessibility to the University, and encourages the introduction of students living in the town centre
where their presence can help to boost the vitality of the centre. The result would be less pressure on areas of more
traditional family housing.

**Paragraph 4.2.17**

This paragraph sets out some of the housing issues in relation to students. The University considers that it would be
appropriate to add the following to the start of the paragraph:

“The continuing growth of the University in particular is important to the prosperity of the borough and the local
plan should include provision for future student housing needs.”

**Paragraph 4.2.18**

The first sentence of this paragraph states that:

“To minimise the pressure on the existing housing stock it is important that any significant increase in full time
student numbers is matched by the provision of purpose built student accommodation.”

The University agrees that as more students arrive there should be more purpose built student accommodation and that
the local plan should make provision for this. The change suggested to Policy H1 would assist in this by making it clear
that the provision of purpose built student accommodation is supported in locations on the campus, close to it and in the
town centre.

The University considers that 60% of the growth in the full time student population (i.e. not the total, but additional
students arriving from the base date of the local plan) is a more realistic target than that in Policy H1 (which the
university has suggested should be removed and replaced with the more positive text it has proposed above).

Hence it would be appropriate to have the following inserted at the end of the text of paragraph 4.2.18:

“We expect 60% of the growth, from 2015/16 onwards, in the University of Surrey full-time Guildford-based
student population to be provided with purpose built student accommodation. This may be located on or off
campus.”

This has the effect of removing the expectation of a target amount from the policy text, where it has no place, and into
explanatory text, where it is more appropriate, whilst also setting a more realistic expectation with regard to growth in
numbers.

The following might also usefully be added to paragraph 4.2.18 as further context:

“The University of Surrey has outline planning permission for increases in academic floorspace and student
accommodation that it expects to build within the plan period. It does not anticipate at this stage any further
significant space needs in the plan period beyond those for which it already has outline planning permission.”
This would make it clear that the University’s needs are provided for already by the outline permission granted for Manor Park in 2004, and still extant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16064  Respondent: 8968001 / M & G Real Estate  Agent: Terence O'Rourke (Tim Hancock)

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

M&G supports Policy H1 which states that development should make effective use of land and a higher density of development would be supported in Guildford town centre. The proposed North Street development is in a prime location to facilitate a high density scheme. It is surrounded by dense urban development with many adjoining tall buildings. The objective to support a higher density of development should be a starting point for policy A6 if it is to comply with policy H1 and S2.

The level of affordable housing should be examined on a site-to-site basis so that major developments are not constrained by the viability of the site. M&G is presently proposing to provide private rented sector housing on the site and believes that a bespoke solution would be best for the North Street proposal.

3.10 Policy A6 suggests only 200 residential units on the site. When this is considered against the Borough wide Policy H1 and the aim of achieving higher density development in more central locations, this quantum should be increased to intensify the use of this sustainably located site. The sustainability of the site can facilitate an increase to 400 residential units of the North Street development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7313  Respondent: 8971233 / Tim J. Harrold  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Policy H1 Homes for All

We consider that this policy should have a sub heading such as:

"The most efficient use of existing urban and previously developed land".

Development of brownfield sites is the first priority. We also will need to look at the vexed question of higher density whilst having regard to existing character not only in Guildford but also other sustainable locations such as Ash and Tongham. This extra emphasis is necessary in order to lessen the need for the consideration of open land whether within the Green Belt or the countryside.

We must use all the urbanland that is available for housing efficiently. We need to look for previously developed land which is no longer required for business or other employment purposes. One important priority is to identify whether
thereis a backlog of sites in Guildford Borough, for which planning permission has already been granted but not yet been
developed. In the past, a great deal of windfall development has contributed towards our planning targets. CPRE sees no
reason why this should not be the pattern for the future as well. Many older buildings survive which are still named after
their former use. We believe that change will result in individual sites becoming available with the closure for example of
small businesses such as local newsagents, post offices, builders yards, and pubs. We would therefore question whether
the estimate made in Policy S2 of 625 dwellings from 2018 to 2033 is accurate and sufficient, bearing in mind past rates
of achievement in this category. Every effort should be made to include a realistic figure for windfalls which in the past
has proved such a valuable element of the housing provision.

It is important that the University of Surrey meets its commitment to build the multi occupancy student housing on its two
campuses that it has promised in the past. CPRE maintains that from now on 100% of new student accommodation should
be provided on the University of Surrey’s two campuses, both of which have sufficient space to replace sections of
surface parking for this purpose. We object to the figure of only 60% of existing students being accommodated on Stag
Hill and Manor Park. We consider that the figure should be higher and the policy wording with its use of the words “we
expect” strengthened. This would reduce the problem of students using leased housing for multi occupancy in the town that
otherwise would be available for year round use by young families with working parents.

The policy does not indicate the density of housing within urban Guildford which should be the objective for future
building. Clearly, this is a sensitive issue which will be affected by a wide range of factors including conservation areas,
height and design. All surface parking sites should be carefully assessed to evaluate whether more multi storey facilities or
underground parking could be considered which use precious space better. We are aware of many individual garages in
rear gardens with access to a road which are neither attractive in appearance nor fulfilling an efficient use of land which
could be built on. We object that the Policy does not include a density figure, or range, for new housing within the urban
area of Guildford, Ash and Tongham. With suitable land so scarce and pressures mounting on open land and Green Belt
surely it is time to be pragmatic and realistic by specifying higher densities for building where this can be done without
harming the quality of life of the community.

There is a need in the town for more flats which are conveniently located for Independent older people that wish to
downsize from their current residential accommodation.

The development of the former Surrey Advertiser offices on Martyr Road is an example of what is required. CPRE objects
to the excessive amount of retail proposed in the town centre on land which could be regenerated with housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslt171/1196  Respondent: 8971745 / Catesby Estates Limited  Agent: Barton Willmore (Gavin
Gallagher)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Policy H1 (Homes for All)

A requirement for accessible homes has been added to Policy H1 which states that on residential development sites of 25
homes or more 10% of new homes will be required to meet Building Regulations M4 (2) category 2 standard 'accessible
and adaptable dwelling' and 5% of new homes will be required to meet Building Regulations M4(3)(b) category 3
wheelchair user accessible dwellings standard or any subsequent legislation on making homes accessible and adaptable.
The Planning Practice Guidance (PPG) states that local planning authorities setting additional technical requirements
exceeding the minimum standards required by Building Regulations, will need to gather evidence to determine whether
there is a need for additional standards in their area (Paragraph: 002 Reference ID: 56-002-20160519). The PPG also
states that ‘local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment’ (Paragraph: 003 Reference ID: 56-003-20150327). Furthermore, the PPG highlights:

“Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations”. (Paragraph: 007 Reference ID: 56-007-20150327)

It is therefore considered that this addition to Policy H1 is not justified and is not supported.

A requirement for self-build and custom housebuilding has also been added to Policy H1. Policy H1 states that self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character. On development sites of 100 homes or more, 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. Policy H1 further states that self-build plots made available must respond to the sizes identified on the register. Policy H1 also states that plots must be made available and priced and marketed appropriately as self-build or custom build plots for at least 18 months. The supporting text of Policy H1 highlights that where plots have been available at market value and marketed appropriately for at least 18 months and have not sold, the plot(s) may remain on the open market as self-build or be built by the developer. The supporting text also states that higher density residential sites for flatted developments are unsuitable for self-build and custom housebuilding plots; they are therefore exempt from the requirement to provide plots.

We acknowledge that the Council has a requirement to deliver a wide choice of accommodation. Whilst we agree to the principle of the requirement for self-build and custom housebuilding, we have some concerns in relation to the implementation of the policy. We consider the timescales of marketing plots for 18 months is too long. We consider that a period of 12 months would be more reasonable and consistent with the National requirement to speed up delivery of new homes.

We welcome the Council’s approach that plots can be built by the developer if they have not sold after the marketing period.

We consider that Policy H1 needs further clarity on whether the mix of dwellings will be taken into account when calculating if 5% of the plots need to be self-build and custom housebuilding. We note the supporting text identifies that higher density residential sites for flatted development would be unsuitable for self-build and custom housebuilding, however we are concerned how Policy H1 could be applied to a site of 100 homes that includes a mix of both houses and flats such as Site Allocation Policy A39). We consider that the Council needs to be more specific regarding the scenarios in which this policy will apply. We suggest that flats are excluded from the calculation for the threshold where the 100 homes trigger would apply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13114  Respondent: 8993121 / Shelagh Yeomans  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1: Homes for all

I OBJECT to this policy

The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated. I support high density development in the urban area. On campus dedicated student...
accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support the general policy statements made in this policy, which are mostly repeating NPPF polices. Our main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY H1 – Homes for all

OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so I must object overall. We support high density development in the urban area. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

I object to the change by way of deletion of the paragraph on density: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.
I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bed spaces on campus.”

The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

I object to the change in relation to Gypsy, Traveller and Travelling Show people pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

I object in particular to the inclusion of 6 Travelling Show people pitches at Garlicks Arch where there is no proven need. I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1920  Respondent: 9062913 / Susan Parker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17875  Respondent: 9078881 / Jean Trickett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GBC must insist that the UNIVERSITY complete the building of the student residences for which they have held planning permission for a number of years as this will help to alleviate the demand for rental properties in the Town and make more rental properties available for essential workers and non-student residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy H1: Homes for All

Object (not effective in respect of NPPF paragraph 182)

WPI supports the flexible approach proposed by Policy H1. The housing needs of the SHMA, as outlined in emerging paragraph 4.2.3, are noted.

A technical objection is raised with respect to the paragraph on density. It is typical for new residential densities to have regard to character and context considerations. However, the opportunity to embrace distinctive new character and density should be reflected in the policy. WPI has made a similar representation with respect to draft policy D1 (Making Better Places).

In addition, the provision regarding specialist housing (by which we assume the plan is referring to tenures such as self build or elderly accommodation) is ineffective, as the policy provides no clarity nor certainty over what is proposed, when or where. It merely refers to supporting specialist housing in ‘sustainable locations’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps__July_2016__and_Appendices.pdf (11.0 MB)

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Policy/Section / page / para Original Changes requested (July 2016 Representation) Understanding of changes shown in the Focused Amendments (June 2017) WPI Comments (Updated Representation)
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment 1

**Comment ID:** PSLPP16/4485  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<tbody>
<tr>
<td>1. <strong>POLICY H1</strong></td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment 2

**Comment ID:** PSLPP16/8082  **Respondent:** 9298689 / Rod Wild  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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<tr>
<td><strong>Policy H 1- Homes for all</strong></td>
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<tr>
<td><strong>OBJECT.</strong> One particular point is the University's 'land banking', applying for more homes when they have plenty of unfulfilled permissions. Stopping this would release homes (and increase council tax take, students being exempt). The university should be aiming for many more students to be on campus.</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID: PSLPP16/14939</th>
<th>Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
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<tr>
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<th>Comment ID: pslp171/1770</th>
<th>Respondent: 9327201 / Andy White</th>
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<td>Guildford’s housing problems are exacerbated by the low percentage of student accommodation provided on campus by the University. The figure should be between 80-100%, which the University could reach by implementing existing permissions.</td>
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<th>Respondent: 9327329 / A2 Dominion Group</th>
<th>Agent: Judith Ashton Associates (Judith Ashton)</th>
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<td><strong>Document:</strong></td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
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<td>Criterion 9 of policy H1 looks to address the issue of self-build and custom housebuilding. It states:- ‘Self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character. On development sites of 100 homes or more 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. For phased development, selfbuild plots must be delivered and serviced at the earliest stage possible. Self-build and custom housebuilding plots are encouraged on smaller residential development sites.’</td>
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| In our opinion this policy will create considerable difficulties in terms of its implementation, especially on schemes that are predominately, or totally flatted. In addition it is in our opinion unreasonable to require all sites over 100 homes to have 5% available for self-build. The financial implications of doing so –specially given the requirement for the land to be laid out and serviced upfront needs to be taken into account. Likewise there are the practicalities of efficient site development / conflict between many various developers/ the implications on the discharge of pre-commencement conditions, and the impact on the housing trajectory. Whilst we appreciate the background to the proposed change to policy H1, the implications have not in our opinion be fully thought through and as such, given the fact that paragraph 17
of the NPPF indicates that predictable decision making is a key element of plan making we consider criterion 9 of policy H1 to be unsound as it is not consistent with national policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10752  Respondent: 9334785 / Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We need a LOW COST housing scheme in all small villages to encourage young people to settle or be able to stay in the community where they grew up. I would see no problem whatsoever with each village in the Borough having to provide LOW COST housing – say 20 houses per village. This would be sustainable and would certainly meet the housing needs within the Borough over the next 20 odd years or so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10632  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1: Homes for All

I OBJECT to this policy on the following grounds:

The “Reasoned Justification” in Section 4.2.18 of the Plan states (my emphasis added): “To minimise the pressure on the existing housing stock it is important that any significant increase in full time student numbers is matched by the provision of purpose built student accommodation. The University of Surrey projects a significant growth in student numbers over the plan period and it is therefore required to accommodate a proportion of student bedspaces in halls of residence or purpose built student accommodation on campus, as set out in the most up to date Strategic Housing Market Assessment. This will enable the University of Surrey to grow at a sustainable rate whilst minimising the impact on the local housing market.”

However, the Policy itself states that “We expect 60 per cent of the University of Surrey eligible student population (full time equivalent) to be provided with student bedspaces and accommodation on campus”, which is inconsistent with the Justification. Given this inconsistency, and the disproportionate effect that growth in student numbers has had on the housing situation in Guildford, a considerably greater proportion of any future growth in student numbers should be accommodated in University accommodation on the campus – I recommend a minimum of 85%. I believe that under similar circumstances the University of Oxford has recently planned for all future student expansion to be on its own land rather than competing directly with the local non-University demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: pslp171/2629</th>
<th>Respondent: 9335041 / David Reeve</th>
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**OBJECT (on 3 distinct grounds)**

1. The paragraph on Density should be retained.
2. Paragraph 5 on student accommodation is far too weak. Specifically:
   a) The phrase “… will be encouraged on campus locations where appropriate” should be replaced by “… will be required on campus locations”.
   b) The word “about” in line 2 of should be removed. Retaining it would simply guarantee a never-ending series of arguments with the University of Surrey.
   c) The proportion of students for whom campus-based accommodation should be provided should be significantly greater than 60%, and this figure should be a requirement, rather than simply an “expectation”.

1. In line 8 of paragraph 4.2.18 of the explanatory text associated with this policy the proposed replacement of “required” by “expected” is unacceptable.

In addition (but not specifically a point of objection) the word “all” in paragraph 2, line 1 is confusing. The line should read either “… net loss of all types of housing …” or “… net loss of housing …”.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1015</th>
<th>Respondent: 9444929 / Markfield Investments</th>
<th>Agent: Turley (Donna Palmer)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
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</tbody>
</table>

**Accessible Homes**

2.22 The revised policy wording seeks to include the following requirement:

“On residential development sites of 25 homes or more 10% of new homes will be required to meet Building Regulations M4 (2) category 2 standard ‘accessible and adaptable dwellings’ and 5% of new homes will be required to meet Building Regulations M4 (3)(b) category 3 wheelchair user accessible dwellings standard or any subsequent legislation on making homes accessible and adaptable.”

2.23 The NPPG makes clear that it is for LPAs to demonstrate the need for these requirements. It is considered that insufficient evidence has been provided by the Council to justify these requirements. The only justification provided by the Council relates to generic comments from the SHMA and Addendum SHMA regarding the ageing population in the Borough. Based on the currently available evidence it is considered the requirement is unsound.

2.24 Furthermore, whilst the supporting text at paragraph 4.2.10 indicates that there will be a degree of flexibility as to how the requirements are applied, this is not reflected in the policy wording. Whilst the principle of the flexibility is supported, concern is also raised regarding the proposed wording which currently states that the requirement will only be relaxed “where substantial evidence is provided to justify an exception.” Clearly this requirement is inappropriate and is not the correct test to be applied. Flexibility should be allowed where proportionate evidence is provided which clearly
justifies an exception. This justification could relate to viability grounds as well as whether a need for the provision to be made on the site can be identified or not.

Self-build and custom housebuilding

2.25 The Policy seeks to require the provision of plots for self-build and custom housebuilding by introducing the following requirement:
“Self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character. On development sites of 100 homes or more 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. For phased development, self-build plots must be delivered and serviced at the earliest stage possible. Self-build and custom housebuilding plots are encouraged on smaller residential development sites.”

2.26 As currently drafted it is unclear whether the requirement to have no adverse effect on the local character relates to the self/custom build element itself or the wider proposals. In any event it is considered that this wording is inappropriate as it seeks to apply a definitive test which does not allow for application of the planning balance. Whilst proposals should seek to have no adverse effect on the local character any harm should be weighed against the benefits of the proposals. Furthermore given the nature of self/custom build, the potential effects on the local character will not be able to be assessed definitively at the point of determination of an application for the wider development site. As currently drafted, concern is raised that the necessary lack of certainty of the effects of these plots may prevent the approval of applications for the wider site if this policy wording is to be rigidly applied.

2.27 The PPG makes clear that the Local Planning Authority must assess the local demand for self-build housing. The PPG advises:
“Plan makers should, therefore, consider surveying local residents, possibly as part of any wider surveys, to assess local housing need for this type of housing, and compile a local list or register of people who want to build their own homes” (ID 2a-020-20140306).

2.28 Whilst the Council’s website provides details of how to apply to be on the register, including details of a recent consultation on revised eligibility criteria, there are no details as to the number of people currently on this register. As such it considered that there is insufficient information to justify the requirement currently proposed.

2.29 Furthermore, whilst we agree that custom and self-build may be appropriate for some schemes, we do not consider that large strategic sites are an appropriate location and are unlikely to be taken up. The policy wording does specify that plots are only required to be made available and marketed for a period of 18 months, before, we assume as this is not explicitly stated in the policy wording, reverting to the developer. It is however considered that this will delay the delivery of the scheme, create uncertainties in the build programme for developers and potentially add additional costs as a result of abortive work.

2.30 Whether or not the percentage requirement of custom/self-build housing is amended, should the be Council be minded to retain a requirement for all housing developments of 100 or more dwellings, we consider that the words “subject to viability” should be added to the policy to provide suitable flexibility. It is considered that the requirement for delivery of self and custom build plots at an early stage will add to the potential viability implications given the early delivery of units is generally required in order to fund necessary supporting infrastructure works. Furthermore, as raised above, if these plots do then revert to the developer due to lack of interest, this would likely lead to additional costs due to changes to the build programme etc.

2.31 It is noted that the supporting text to the policy states that:
“Higher density residential sites for flatted developments are unsuitable for self-build and custom housebuilding plots; they are therefore exempt from the requirement to provide plots.”

2.32 The wording of the supporting text is not reflected in the Policy wording itself as currently drafted. Furthermore there is no clarity on the Council’s definition of higher density and how this would be applied to developments which contain a mix of houses and flats.
2.33 As currently drafted this requirement is considered to be unsound in that it is not justified, effective or consistent with national policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6376  Respondent: 9607905 / Anne Pascoe  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

13. I OBJECT Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparator boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17364  Respondent: 10270913 / ECA (Martha Covell)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1- Homes for all: Support with comments

We support the view that the Borough aims to "deliver a wide variety of high quality homes that provide all tenures, types and sizes of housing to meet the needs and demands of different people in the community." Policy H1 relies upon the Strategic Housing Market Assessment (SHMA) to inform any new development coming forward. The SHMA identifies a housing need of 693 dpu, previously set out.
This includes the allocation of the Wisley Aredrome site, which we have previously objected to as set out under policy S2.

Para 4.2.5 states that the Borough would “wish to see an appropriate mix of homes provided across the Borough, including the villages. Whilst all new development must be in keeping with the character of the surrounding area this does not preclude the delivery of smaller units as these are capable of being designed in such a way that respects the prevailing built form.”

The proposed Masterplan for the TREG consulting site in Effingham shows how the proposed development could include a range of dwelling types and sizes to meet a wide variety of housing needs, whilst maintaining adequate spacing between dwellings and be of a proportional size to the village to maintain the character and appearance.

The location of the TREG Consulting site, by comparison to the site north east of Effingham Village, is not in the conservation area or close to the boundary, and as a result will not have a detrimental effect upon the special and historic interest of the Effingham conservation area and listed buildings, or their setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10545  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/1092  Respondent: 10569473 / Laura Gold  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Support the content of H1 and appreciate members of the travelling community being considered and included as part of the Local Plan. It is a good idea to bring pitches in a phased way with big developments and sets a good example for other boroughs. Support inclusive communities, such as the Send site, to break down the ‘fear factor’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1093  Respondent: 10569537 / Kelly King  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Support the content of H1 and appreciate members of the travelling community being considered and included as part of the Local Plan. It is a good idea to bring pitches in a phased way with big developments and sets a good example for other boroughs. Support inclusive communities, such as the Send site, to break down the ‘fear factor’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2240  Respondent: 10579233 / Roger Hawes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The increase in housing proposed, may be out of date due to the recent decision of the government to leave the European Union. This will have a knock on effect on the green belt and the effect of traffic and infrastructure. All these are very bad in this crowded area of South West Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9750  Respondent: 10616289 / Hilary Percy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am not convinced about the need for so much new housing or the emotive reasons given by the council, "new homes for essential workers such as nurses, teachers, police officers and firefighters"!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/84  Respondent: 10617601 / G Rabin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the new figure of 693 houses required in the borough per year. (322 in previous plans.) The figure cannot be verified. We should have transparency and the council should publish the SHMA report.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12676  Respondent: 10619169 / Wendy Critchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2467  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the rationale resulting in the need for massive increase in housing stock in the borough which is based on flawed evidence. Guildford Council’s assessment of housing need is overestimated by about 40% because of inaccurate assumptions about the number of students seeking to remain in the area once completing university studies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5900  Respondent: 10643457 / Burpham Neighbourhood Forum (Catherine Hughes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Build smaller homes for first time buyers and/or for the elderly to free up larger family homes.

Do not rely on a system where developers build large homes to finance smaller ones. Build social housing out of Government funds now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8214  Respondent: 10662849 / Garry Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **I object (POLICY H1- Homes for all)**

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/453  **Respondent:** 10701537 / Ben Gamble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects: i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1495  **Respondent:** 10717985 / Alison Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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**Section page number** 165 of 445  **Document page number** 166
I object - this comment is included above: 'Residential densities will vary dependant upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre'. If this is the case why proposing building nearly 500 houses in Send. Why propose building 70% of 13,860 houses within the Green Belt along the A3?

As with Policy 1, there is no clarity, no clear definitions provided, no framework on which to consider and make complex decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/757  Respondent: 10717985 / Alison Drennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the changes in this Policy as GBC used unsafe and inappropriate data on which to "support" their proposals. For instance the figures from the revised West Surrey SHMA (Strategic Housing Market assessment) are misleading and offer an inflated housing target for the Borough of Guildford, in large part because of the transient student population associated with the University. Census data takes term time address as permanent places of residence and housing needs are based on this - irrational, misleading and not in the interests of locals who live here, pay taxes here and vote for the council.

2. I object to changes in the Policy and with GBC's assertion that affordable housing will be provided. Recent research from the CPRE’s (Campaign to protect Rural England) annual Green Belt Under Siege report shows that more than 70% of houses proposed for development are not expected to be ‘affordable’. It also demonstrates that just 16% of houses built on Green Belt land since 2009 outside local plans were classed as ‘affordable’.

Guildford Borough Councils proposed Local plan is a travesty of democracy and of consultation with local neighbourhoods. It clearly does not represent the views of local residents, but instead the interests of developers. I can only hope the Inspectorate will recognise this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17916  Respondent: 10722049 / Richard Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to this policy on the grounds that the ‘all’ appears to be appear all but the people living in the rural communities surrounding Guildford Town (POLICY H1 – Homes for all)

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim is necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. This is another serious flaw in the plan.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. This would have many benefits to Guildford itself.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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<tr>
<th>Comment ID: PSLPP16/12602</th>
<th>Respondent: 10769121 / Ali Elson</th>
<th>Agent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g., Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g., by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17012  Respondent: 10773153 / Miles Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g., Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g., by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/921  Respondent: 10773377 / Margaret & Morten Frisch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The number of housing units far too high – it fails to reflect the impact of Brexit which will be severe;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13607  Respondent: 10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11557  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1780  Respondent: 10776225 / Roger Main  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1 – Homes For All

I OBJECT. The proportions proposed in 4.2.3 are based on the same mysterious model used to project the housing demand. There is no transparency in where the numbers come from.

The University of Surrey gets off far too lightly. It has vast areas of surface car parking which could – and should – be used for housing, with parking space either below the housing or in adjoining multi-storey car parks. There is no need for it to build on greenfield sites and it would immediately reduce the alleged housing demand in the borough by a significant proportion. There is already planning permission for a large amount of student accommodation which has not been built, yet the University wants to expand the area of its campus even further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/364  Respondent: 10776225 / Roger Main  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the (revised) proposed increase in housing stock. Government predictions are for approximately 10% growth in population, which in any case could change substantially depending on the terms of Britain’s exit from the EU. Student accommodation, if required, should be provided by the University of Surrey on its existing sites. Large areas of land, originally designated for accommodation, are at present used to provide surface car parking. The land should be utilised much more efficiently – using multi-storey car parks or building above ground floor parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10214  
**Respondent:** 10780929 / Naren Nanda  
**Agent:**

Document:  
Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 - Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1401  
**Respondent:** 10780961 / Hillary Ingle  
**Agent:**

Document:  
Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A 60 bed nursing home. As an elderly person I would never willingly go into a home in what will be a built up area surrounded by 1,500 children and family houses with noisy cars, pets etc.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13685  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL):

- Policy doesn’t set any constraints on building.
- Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15330  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9132  Respondent: 10785633 / Penelope Eagle  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11131  Respondent: 10787073 / Clare Arnold  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy H1 - Homes for all - I object to this part of the plan as the planned developments in the area are too high in density and will disrupt the nature of existing street patterns which is in contradiction to the aim.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15045  **Respondent:** 10796417 / Richard Shenton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/847  **Respondent:** 10798049 / Steve & Maureen Knight  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Support – more affordable and social housing needed with Guildford young people getting priority. Increase density for first timers.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/235  Respondent: 10798977 / Ian Brooks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the hiding of development by “deferment” (A24, A25, A26, A43)
This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

1) to hide the number of housed actually being built (A24, A25, A26 — total of 1100 deferred, but still being built!); and
ii) give an excuse for building houses on another site (A43 — 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/326  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so we must object overall. I support high density development in the urban area. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18372  Respondent: 10799169 / Neal Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so we must object overall. I support high density development in the urban area. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/505  
Respondent: 10799169 / Neal Basson  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so we must object overall. I support high density development in the urban area. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17519  
Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. We support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station.

Much of Guildford town could usefully be regenerated with 5-6 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan.

In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks).

If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
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<th>Comment ID: PSLPP16/539</th>
<th>Respondent: 10799809 / Judy Simpson</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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</table>

I object to the local plan proposal to allow a travellers site anywhere in Send as there are so many young people trying to live in Send that it would be wrong to give space to people who have not contributed to the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/815</th>
<th>Respondent: 10804961 / M. Basson</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/111</th>
<th>Respondent: 10805217 / John Carr</th>
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<td>Document:</td>
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</table>

1. HOUSING NEED

The revised policy proposes a target for new housing in Guildford borough of 12,426 homes, a reduction from 13,860 homes proposed in the previous draft local plan. This is a fall of some 10.3% in the total number, although the annualised figure of 654 dwellings per annum represents a reduction of only 5.6% because of the different time periods considered by the revised plan.

This revised target for borough housing is still excessively high - the conclusions of the revised SHMA are seriously flawed.
The West Surrey Strategic Housing Market Assessment: Guildford Addendum Report, 2017 (‘SHMA Addendum’) issued by consultants GL Hearn in March 2017 provides an update on the previous SHMA issued in 2016. Much has happened in those 12 months, particularly the imminent prospect of Brexit, which is likely to result in major changes in population trends, migration patterns and the economic development of the UK.

GL Hearn attempts to address this prospective uncertainty by presenting four alternative scenarios for their models, based upon different assumptions over the basic population projections utilised. Their four scenarios result in projected overall growth of Guildford borough housing needs over the plan period (based upon demographic trends) which is estimated at between 10.4% and 15.3% dependent upon the scenario assumed.

The lowest of these figures, 10.4%, is derived using projections based upon a 10 year migration trend and making an UPC (‘Unattributable Population Change’) adjustment as proposed by the ONS in order to take account of various statistical anomalies in sampling sizes, etc. This forecast population growth of 10.4% leads under their analysis to an annualised housing need for Guildford borough estimated to be 521 dwellings per annum. For reasons that are not explained GL Hearn recommends that GBC adopt the higher end figure of their scenarios, resulting in a proposed demographically-based housing need of 559 dwellings per annum, which is the figure adopted in the Local Plan.

As in their 2016 SHMA report, GL Hearn then proceeds to increase this figure further through a series of adjustments to reflect high levels of projected economic growth, additional student housing demand and the needs for more affordable housing. This approach is nonsense. Economic growth factors are effectively already included within the household growth projections put forward by the Department of Communities & Local Government. GL Hearn have increased their proposed overall housing need figure to 654 dwellings per annum, an increase of 95 dwelling over their own (upper end) demographic trend figure. GL Hearn’s justification for this increase is primarily to address affordable housing needs within Guildford borough and to a lesser extent to make extra provision for student housing. This adjustment makes no sense. Under GBC’s Affordable Housing policy 40% of all dwellings at new developments must be built as affordable homes – therefore with a target housing figure of 12,426 new homes, that means that almost 5,000 new affordable homes would be built in the borough under this policy. Why a further adjustment is needed on top of this figure is hard to understand. Moreover, it begs the question: if more affordable housing is built above the 40% policy target, just who precisely is going to pay to subsidise this construction?

The net result of GL Hearn’s analysis is a projected housing need of 654 homes per annum, which if built would represent an overall increase of 22% in the housing stock of the borough. This compares to the ONS projection for population growth over the plan period (based upon a 10 year migration trend and making the ONS-proposed UPC adjustments) of just 10.4%. GBC are therefore proposing a housing figure which is more than twice this level of projected population growth. This is clearly unjustifiable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability.

Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Despite the issues raised in 2016 little of any significance appears to have changed, which leads me to believe that you do not accept any of the objections to the Local Plan.

Housing Growth- GBC has again shown population growth which is questionable, suspect, and unsupported by relevant figures.

I object to the housing growth projections and Housing targets

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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</table>

To this end I believe that the unsatisfied demand for housing first needs to be established to be a genuine local demand for people who are either born in the locality, need to live in the locality as a consequence of their local employment or are existing residents needing to up or down size. Under current Planning Consent too many local homes have been demolished, enlarged or extended to maximise developer’s profit with an associated loss of affordable smaller dwellings. These larger houses are then often occupied by families taking advantage of the high prices obtained for inner city property and moving out to enjoy the quality of life provided by living in the Green Belt. This latter demand is not local and should not be satisfied by new developments on the Green Belt but by normal availability of existing housing stock. The Plan contains some questionable forecasts for future housing demand but no creditable proposals as to how this might be measured in reality given the timescales involved and possible changes in demographics and/or the economic climate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2139  Respondent: 10820961 / D Davies  Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</th>
</tr>
</thead>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
I feel there should be a lot more transparency from Guildford Borough Council and so that these things are not decided behind closed doors. This transparency should also be applied to councillors.

Also putting large numbers of small houses that are not really suitable for living in with paper thin walls are put up to give builders and property developers huge profits it's about time house were built that people can live in properly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3999  Respondent: 10826305 / E.M. Hart  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing Needs – My husband and I are well into our seventies and there is almost no possibilities to downsize as we find that brown field sites which have been previously developed there has been a tendency to construct large houses, with almost no consideration for first time buyers or those wishing to downsize. Any development must take into account the provision for older people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6626  Respondent: 10829121 / Julie Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY H1 – Homes for all

• The policy doesn’t set any constraints on building.
• Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• I support higher density development in the urban area
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9683  Respondent: 10832673 / Lisa Hall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am lodging my views on the Send housing development as per below. Also, why do we need two travellers sites in Send?!!!! What justification is there for these two separate sites? We've seen no details of traveller demographics in the area to support that. Please acknowledge this email as I tried lodging my views before and got told I couldn't email in until after a certain date!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3902    Respondent: 10833537 / AC Vause    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brex it projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3463    Respondent: 10843361 / Natalie Brown    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to POLICY H1 – Homes for all

- The policy doesn’t set any constraints on building.
- Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- I support higher density development in the urban area
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14904  Respondent: 10843905 / G King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

H1 – Homes for All - Affordable Homes

80% of Surrey house prices are not affordable to most workers in the local area. These houses will not be affordable. The proposal that by setting the price at 80% will suddenly transform the ability of a nurse or teacher to purchase is unsubstantiated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14480  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 I object to policy H1 “Homes for all” on the grounds that;

1.2 Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

1.3 The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

1.4 Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no
need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

1.5 Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1103  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

With reference to section 5.22 of the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017, the statement that “it is reasonable to consider that 40% of housing could be delivered as affordable for the purposes of following the advice set out in the PPG as above” is a clear example of wishful thinking on the part of those writing the report and is not supported by any evidence. On the contrary, experience shows that 40% is a wildly optimistic assumption and it is reasonable to expect that the council will struggle to get developers to agree to anything in excess of 20% at best.

The proposed changes to the plan will not satisfy the goal of the policy i.e. to deliver a wide variety of high quality homes that provide all tenures, types and sizes of housing to meet the needs and demands of different people in our community.

It is also noted that section 5.20 of the above referenced report highlights that "The updated assessment indicates that 517 households per annum require support in meeting their housing need. This is higher than assessed in the 2015 SHMA, reflecting higher new household formation shown in the updated demographic analysis together with evidence that lower quartile rental growth has exceeded growth in incomes, meaning a higher proportion of households fall into affordable housing need". GBC offers no credible solution to this problem and instead will only exacerbate the issue by building a large number of homes catering to the relatively wealthy, and thereby creating further need for affordable housing to meet the needs of the greater number of lower income people attracted by the inevitable greater level of economic activity. GBC’s approach is therefore not sustainable and will do nothing to meet the aspiration of its own policy.

With regards to the changes to this policy, I object to the change by way of deletion of the paragraph on density: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.” This suggests that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.” The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and
underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

I object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

I object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need.

I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>pslp171/2132</th>
<th>Respondent:</th>
<th>10847521 / Andrew Procter</th>
<th>Agent:</th>
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1.1 I object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

1.2 I object to the change by way of deletion of the paragraph on density: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

1.3 This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

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1.5 I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedsaces on campus.”

1.6 The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford)
insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

1.7 I object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

1.8 I object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need.

1.9 I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

1.10 To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7181  Respondent: 10854113 / Sarah Pickering  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks).
parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Policy H1: Homes for all

I OBJECT to this policy.

The housing mix is based on the flawed assumptions and calculations in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised nor evaluated.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: psp171/1718  Respondent: 10857889 / William Kyte OBE  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The changes have weakened this policy. The University should be required to accommodate at least 80% of its students on campus; it already has sufficient land to do so.

The paragraphs relating to density have been deleted. To ensure developments make appropriate use of space there must be a policy to ensure that densities are consistent with local character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18588  Respondent: 10858977 / Angela Otterson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 6/10 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

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1.10 To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1608  **Respondent:** 10865537 / Edwina Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13660  **Respondent:** 10874273 / Margaret Pearce  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to policy H1 (homes for all) it fails to compel The University of Surrey to use its existing planning permission for student accommodation which would free up houses needed in the town.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp171/1802</th>
<th>Respondent: 10876897 / Norman and Morag Evans</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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1. The contentious Strategic Housing Market Assessment (SHMA) has been slightly reduced but still remains excessively high without proper justification. The Council has consistently refused to reveal the methodology used by consultants with links to the Government and an involvement in planning, so it is impossible to see how the figure has been arrived at or to question the methodology. This is not only secretive but also antidemocratic. Since the people of Guildford are ultimately paying for the report, it is a scandal that they have been denied the right to scrutinise it.

a) Even taking account of Brexit, the consultants have chosen the highest estimate for population increase, representing a 22% rise in housing stock while the ONS predicts only a 10.4% increase. Brexit and other related uncertainties make any forecasts highly unreliable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/11019</th>
<th>Respondent: 10878977 / Lisbet Hjort Jensen</th>
<th>Agent:</th>
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1. I OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan peri It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks).

If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1579  Respondent: 10882465 / Colin Bowes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

In terms of the requirement for housing, I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. and the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels. Policy S2 states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18207  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/226  Respondent: 10883841 / Gillian Millership  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GBC plans to increase its housing stock by 22% despite ONC forecast of only a 10.4% population growth - **I OBJECT TO THIS PROPOSED INCREASE OF 22%**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1107  Respondent: 10884993 / Dave Fassom  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **I OBJECT (POLICY H1 – Homes for all)** Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6852  Respondent: 10889985 / Ruth Macdonald  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13513  Respondent: 10890177 / Cheryl Burnside  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3507  Respondent: 10892513 / C.R. Sewter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing demand in the Local Plan H1 has dropped by 39 houses per annum from 2018 to 2034. Despite this Send's contribution has been increased with no justification.

The Local Plan H1 Policy states that Gypsy, traveller and Travelling showpeople accommodation should be provided on development sites of 5000 homes or more, whilst there remains an indentified need. "The Send allocation is 2 traveller pitches and 8 showpeople plots. The developments at Gosden Hill and Wisley of over 1500 houses have been allocated just 8 pitches a piece during the same period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1495  Respondent: 10894561 / David Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The increase in housing, which has been subject to a very serious challenge from the GRA, is still excessively high and seems in no way to map onto infrastructure proposals. This figure must be looked at in a much more holistic way than appears to be have been done at present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support the policy with a few reservations

It is acknowledged that much work has gone into preparing this policy.

I support the inclusion of Gypsy-Traveller (GT) policy as part of Homes for All with fair and equal treatment as part of general housing need.

I support the inclusion of site allocations for GTs

I support the recognition of need to provide choice of sites by size and tenure

I support the need to remove land from the Green Belt to meet need. I fail to see how else need can be met in this Borough. A similar approach was agreed as part of the Solihull EIP/Local Plan.

I support the inclusion of sites as part of housing allocations but do not like reference to 'whilst there remains an identified need'. It is far from clear how policy will be relied on to deliver and when. It is not clear as to phasing and when permissions will be granted. I worry developers will seek to argue the need no longer exists. I worry sites will not come forward quickly enough to meet immediate need and need post 2017. Greater clarity would be welcome. The minimum figure of 500 homes is a high threshold. There would appear to be few sites where provision will be made. I wonder whether the threshold needs to be lowered to 250 or 300 to provide gt choice and certainty sites will be delivered.

4.2.21- I am unclear where the suggested limit of 9 pitches/plots or less comes from. That seems a bit prescriptive. Gov policy (not longer saved) suggested 15 pitches or less was an ideal limit. Two site allocations are for sites with more than 9 plots/pitches. I think this is a matter best left to site specific issues. This should not be used to thwart applications for larger sites where appropriate.

4.2.22-GTAA 2012 is dated. Need should be expressed as a minimum figure not a ceiling limit. Need for 43 pitches should make clear it is for period 2012-2017 and for 30 pitches post 2017.

It is not accepted that the immediate need to 2017 is met. The site at Cobbets Close is existing with 17 pitches. It is proposed to extend this to 20 pitches adding 3 not 20 pitches. By my calculations policy as submitted will deliver only 37 new pitches 2012-2017 if the plan is adopted, not 43 (ie 3 at Cobbets and 34 on 8 other sites not including A50 for showmen). (note: I apologise if I am referring to old data but can not risk going back and checking policy again as last time I did this I lost all my comments as there seems to be no mechanism to save comments). For this reason I fail to see how policy is sound and legally compliant. It does not appear to deliver enough sites to meet identified need in accordance with PPTS/NPPF. If I am wrong then no issue is taken with soundness and compliance.

4.2.23 There is a pressing and urgent need for more transit provision. The GTAA is not the obvious mechanism to assess this. Post Sept 2015 and change to PPTS GT definition all lpas should include provision for GTs or they will not be able to travel for work. Government policy now requires GTs to travel in order to be settled. All councils should make provision for Transit sites if GTs are to be able to comply with the new definition. Provision of transit sites must be a priority.

4.2.24-support allocations as part of larger housing schemes but unclear how this will be delivered.

I do not see why sites removed from the Green Belt should be restricted by personal conditions.

I strongly support allocations A52 and A57 and would want to be informed if there is any intention to delete or remove them from the submitted plan. Both sites are occupied by families I have assisted with applications and appeals and have
genuine need to be settled in this area. If this were to happen by way of any modification I would want to exercise the right to attend the EIP on behalf of the occupiers of these two sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18114  Respondent: 10910273 / Lynda M Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We support the general policy statements made in this policy, which are mostly repeating NPPF polices. Our main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7206  Respondent: 10915361 / Judy Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all
I OBJECT to this policy which has not been adequately evaluated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2300  Respondent: 10917985 / Alan Stephenson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In view of flawed new evidence, Guildford's proposal for 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

Population Growth

There is evidence that Guildford's population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.

Student Accommodation
The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14765  Respondent: 10920129 / Steven Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Homes for all OBJECT. Again I challenge the scale of new building being proposed and raise the concern that the infrastructure cannot support it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3573  Respondent: 10922017 / Arthur Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not believe that the housing requirements for Guildford have been properly calculated and I understand, have refused to disclose their calculations. It is my belief that there is sufficient brown field sites in and around Guildford that can accommodate much of the housing needs and priority should be given to these sites first.

I am also dismayed and puzzled why Guildford BC should take many months to announce a plan for the parish and then within a few weeks re-issue it with many more dwellings allocated to the Parish and with an extremely short period for the public to comment. As far as I know there has been no explanation for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11312  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL):

Policy doesn’t set any constraints on building.
Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.

Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.

Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2105  Respondent: 10924609 / H Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the amended number of new houses per year as it is still based on the model in the SHMA report, which the Council will not publish and so cannot be challenged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/333  Respondent: 10926849 / Nicole Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Since Brexit, forecasts of increasing population numbers have been reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8193  Respondent: 10927201 / David Pinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It appears to me that the stated policy regarding housing mix and density is inconsistent with the actual proposals. The proposed development of 485 homes on 5 sites in West Horsley (A37/38/39/40/41) is at a considerably higher density than we have currently in the village. If we are to have some development in West Horsley the proposals should be in line with the policy, i.e. housing density should consider "the local area context and character and the sustainability of the location". I object on the grounds that the current proposals would be out of character with the existing mix of different housing styles and layout of the village.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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<tr>
<th>Comment ID: PSLPP16/9018</th>
<th>Respondent: 10928737 / Guy Pashley</th>
<th>Agent:</th>
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I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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<tr>
<th>Comment ID: pslp171/242</th>
<th>Respondent: 10930561 / Robert and Gill Churchlow</th>
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The plan is proposing far too many houses. The plan says that 654 new houses are required, an increase of 22%. This compares to a 10 year forecast population growth of only 10.4%. Furthermore, this figure takes little into account for the impact of Brexit, which will have a material negative impact on population growth over the projected period. The adjustments for additional affordable housing need, over and above the 40% required within new development, are
bizarre. Why is the plan proposing to build more than twice the number of houses required (even before adjusting for Brexit)?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY H1 -Homes for all

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"5 This has been challenged by residents including, by Mr Ben as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model.

"6 See http://www.glheam.com/developer/Pages/Overview.aspx : "we act for many of the leading developers." G L Hearn is now part of Capita Real Estate.

"7 See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016: "I would like to highlight the difference between the Objectively Assessed Housing Need (OAN) figure produced by G L Hearn (693 homes per year) and the Housing Target for the Local Plan. Some opponents of the Local Plan appear to blur the edges of the two figures. The OAN figure is the one produced by the modelling tool. The Housing Target figure is the proportion of the OAN that the Council feels it can successfully deliver. Based on the infrastructure that Highways England, Surrey County Council and others suggest they can provide over the next 15 years, the Council believes it can deliver the full OAN number as the Housing Target. However if, during this consultation, or later on, the anticipated infrastructure is not going to be provided then the council will be forced to apply further constraints to the OAN number, which may reduce the Housing Target number. Therefore, it is clear that the OAN and the Housing Target are not the same. The OAN is objective and the Housing Target is subject to constraints."

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.
Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1674</th>
<th>Respondent: 10933857 / C J Tilbury</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 - Homes for all

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

"5 This has been challenged by residents including, by Mr Ben as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model.

"6 See http://www.glheam.com/developer/Pages/Overview.aspx: we act for many of the leading developers." G L Hearn is now part of Capita Real Estate.

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Attached documents:

Comment ID: PSLPP16/15359  Respondent: 10935201 / Cathryn Walton  Agent:

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Attached documents:

Comment ID: PSLPP16/17936  Respondent: 10939201 / Dylan White  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford does need high density small affordable housing in the centre of town. It does not need 4 and 5 bedroom houses bought by people who commute to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12808  Respondent: 10940833 / Natasha Taylor  Agent:
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**Comment ID:** PSLPP16/9324  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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**Comment ID:** pslp171/672  **Respondent:** 10944513 / Amber Ellis  **Agent:**
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1. I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for
not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3058  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Attached documents:

Comment ID: PSLPP16/15816  Respondent: 10953249 / Charlotte Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In respect of the 2x traveller pitches, I believe this site is not of sufficient scale to trigger the policy threshold for providing traveller accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10702  Respondent: 10957857 / Adam Aaronson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all

I object to the proposed housing mix, based on the assumptions set out in the Strategic Housing Market Assessment (SHMA). The SHMA has not been scrutinised or evaluated and seems to be a figure dreamt up by an expensive firm of consultants who are not prepared to release their underlying figures on the spurious grounds of data protection and it seems that councillors are gullible enough to accept these figures without scrutiny. One councillor stated that there was no point in employing a dog and then barking oneself. Another said that of course the figures were wrong, but not sufficiently wrong to matter! Until the underlying data is released there is no basis for accepting these figures. They are just a fairy tale.

I am in favour of high density development in the urban area. I recognise the need for student accommodation and agree that this should be provided for 100% of new students and more than 60% of existing students. This would free up suitable family accommodation in the urban area.

So far as I am aware Guildford borough already has a excellent track record in providing traveller sites. Indeed this is proportionately higher than most comparable boroughs. When evaluating the need for additional traveller site, this record should be taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6661  Respondent: 10958753 / Ingrid Molossi  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
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Attached documents:

Comment ID: PSLPP16/12288   Respondent: 10962689 / Martin Ladd   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
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Comment ID: PSLPP16/14410   Respondent: 10962785 / Derek Gilmore   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
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Attached documents:

Comment ID: PSLPP16/12982  Respondent: 10972065 / Sarah Cocke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey
University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9192  **Respondent:** 10985057 / Anthony Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

Homes for all – I OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so I object overall. I support high density development in the urban area. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4994  **Respondent:** 10986689 / Richard Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

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Section page number 218 of 445  Document page number 219
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/796 **Respondent:** 10988417 / Barry & Renate Grossmith **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

After reading a summary of what the New Local Plan contains particularly in respect of West and East Horsley one can only conclude that Guildford Borough Council's planners lack integrity and professionalism.

**Integrity is certainly lacking when a wise and longstanding environmental planning law is revoked for the sake of expediency when better alternatives are at hand.** This of course refers to the removal of Green Belt status. Such is the stuff of Alice in Wonderland: "Green Belt only means Green Belt when I say it does".

The same applies when plans are made to turn two villages into one suburban bubble in the already densely populated south east England in spite of the fact that the local and surrounding infrastructure is already overloaded. To any casual observer it is obvious that Ockham Road South is unfit for the purpose of serving the volume of car traffic, cyclists, pedestrians, HGVs and school buses. The railway bridge has recently undergone extensive repairs as the result of HGVs driving into its low arch. The road is nothing more than a converted horse and cart track. Its width for much of its length and that of its one narrow footpath discourages its use by pedestrians and cyclists at a time when these means of getting from A to B should be positively encouraged. 'Access only' restriction for HGV’s is apparently not an option because this restriction cannot apply to a B road. Now isn’t that strange? The status of Green Belt can be revoked at the drop of a hat but B road status is sacrosanct. Why is that?

As residents of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], a block of ten flats in the middle of village of East Horsley, we see daily the inadequacies of the access road to the public car park behind Station Parade. HGVs emptying the recycling bins or delivering goods to the shops are colliding with and causing damage to our boundary fence and the roadside kerb because there is inadequate turning circle for modern HGVs. The recycling centre at the entrance to the car park already lacks the capacity to deal with the volume of waste material deposited by local residents and incidentally the local shops. The result when the bins are overflowing - almost a weekly occurrence - takes on the appearance of a backstreet in Calcutta minus the cows. All measures taken by the relevant department at GBC over the last 5 years resulting from complaints by our residents’ company have not resolved either of the these health and safety problems.

Using the search facility provided on your Local Plan website and entering the words 'demographic analysis' we have failed to find any reference to such analysis. So for whom is building land required? The number of over-65s has risen by more that 20% in a decade and research would tell you that it is difficult to find high quality flats for local elderly people who want to downsize. The speculative builder who built Maranello House in 2003/4 thought his target group were young upwardly mobile professionals - how wrong can you get? He certainly hadn’t done his market research. The ten luxury flats here were soon snapped up by local residents who wanted to downsize because of their advancing years. And
currently when one of these flats comes on the market it is likely to be the subject of gazumping because of high demand and limited supply. Such purchasers want to stay local to retain their social contacts within the local community and be in a location which is within walking distance of shops and local amenities. Unfortunately it is still clear that too many family homes are lived in by single seniors who cannot find flats of sufficient high standards and attractiveness. These are the equivalent of NHS bed blockers.

The recent example of the most inefficient use of land development in East Horsley is the one on the corner of Cobham Rise and Station Approach. Again it is clear that the speculative builder was obviously unaware of the market. The resulting two-storey terraced houses on two floors were slow in selling. That land was not developed to its full potential either in terms of unit numbers, the specification and suitability for local down-sizers who require living units on one level = flats with lift access. It is clear that neither the speculative builder nor Guildford Borough Council planners were aware of this missed opportunity for the optimal use of the land.

Neither Maranello House nor the Cobham Rise/Station Approach developments have underground car parking beneath their buildings. Instead both have outside impervious tarmac parking areas. This results in more water running into the already overloaded drainage system instead of using the land for environmentally attractive garden areas that would make flat dwelling attractive for those seniors who lose their gardens when downsizing.

Without proper market research particularly that of a demographic nature any plan is worthless and an outside independent marketing consultant should be engaged as a matter of urgency to examine the efficacy of Guildford Borough Council’s planning department’s staff.

A return to the drawing board in any case is necessary due to the Referendum result which is forecast to see a reduction in London’s population due to the transfer of many employees in London’s financial services to the Continent. Surrey in general including the commuter villages of East and West Horsley will certainly be affected.

As you can see we have sent copy of this email to the parliamentary office of our local MP, Sir Paul Beresford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: PSLPP16/14635  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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<th>Comment ID: PSLPP16/7419</th>
<th>Respondent: 10992833 / Amanda Verny White</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11190  Respondent: 10998081 / David Marshall  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<th>Comment ID: PSLPP16/12006</th>
<th>Respondent: 11000865 / Nicholas Clemens</th>
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POLICY H1: Homes for all

I support the general policy statements made in this policy, which are mostly repeating NPPF polices. Our main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/13885</th>
<th>Respondent: 11001249 / Lesley Milton</th>
<th>Agent:</th>
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I agree that some extra housing is needed in the Horsleys and in the Guildford borough and that a better mix of properties is needed – we need more properties for first time buyers and more for those wishing to downsize.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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<tr>
<th>Comment ID: pslp171/549</th>
<th>Respondent: 11001505 / Greta Edwards</th>
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The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that
developers will use land inefficiently, putting additional pressure on the countryside and un-developed land. This deletion is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15983  **Respondent:** 11004161 / NFU South East Region (Tom Ormesher)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Guildford Proposed Submission Local Plan Consultation**

Thank you for inviting the National Farmers Union to comment on the submission draft of the Local Plan. The NFU is an industry representative organisation, which aims to safeguard the farming and growing business interests of our members and to promote conditions for the wider industry to retain a secure and competitive foothold in the UK economy. We represent some 55,000 farm businesses in England and Wales involving an estimated 155,000 farmers, managers and partners in the business, the large majority of commercial farm businesses in England. Our views are generated through consultation with a democratically elected membership structure, representing all sectors of the industry.

**The Need for Rural Worker’s Dwellings**

The need for new dwellings for agricultural workers (and for employers, farm managers, partners and directors) arises from a number of different circumstances, notably:

- **Succession planning** – where there is only one dwelling on a farm holding, transferring the management of the business from one generation to the next can be difficult

- **Expansion and change** – where farming practices change and particularly in the case of expansion there may be a need for an additional dwelling.

- **A completely new enterprise** – where there is a new enterprise a dwelling may be justified.

In all of these circumstances there are legitimate reasons why a farm worker is required to live “in sight and sound” of the farm unit. Examples include for the betterment of animal welfare such as managing problem or diseased stock, responding to freezing temperatures or adverse weather and increasingly to manage site security issues.

Without the availability of a farm worker in sight and sound of a new or existing farm unit, the viability of the business can be called into question. It is therefore essential that there is a route through the planning system to enable such developments to take place.

We are extremely concerned that the Plan does not offer any feasible option for the development of privately owned rural workers accommodation.

**This is an issue of substantial concern for the farming sector and we request that an appropriate additional or amended policy is included before the Plan is submitted for examination.**

As you are aware NPPF 55 states “Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as: the essential need for a rural worker to live permanently at or near their place of work in the countryside”.

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Without accommodating the requirements for rural workers dwellings, we highlight the risk that the Plan may not “enable the delivery of sustainable development” in accordance with the NPPF, which according to Paragraph 182 would be grounds to reject the Plan on the basis that it is not sound.

We also consider that in not providing a means by which rural workers dwellings can be built, the Plan may not have considered all of the objective development requirements within the Borough. As such there may be grounds for the inspector to find that the Plan has not have been “positively prepared”.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Policy H1: Homes for all**

Rural workers’ housing appears not to have been considered within the strategic housing market assessment and does not fall into any of the categories within Policy H1 such as “housing for older people”, “specialist housing”, “travellers” or “students”. In this context it appears that the accommodation needs of farm businesses have not been taken into account within the Plan?

We recognise that there might be a feasible option for farms to apply as a “self-build and custom housebuilding project” however this would be subject to compliance with Policies P1, P2 and/or P3, such as:

- **Policy P1 Surrey Hills AONB** – specifies the requirement to comply with NPPF116 “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances”. However it is far from clear to what degree would an application for an essential rural workers dwelling fall within this restriction?

- **Policy P2 Green Belt** – “Buildings for agriculture and forestry” are obviously exceptions to green belt policy under NPPF89, however would a rural workers dwelling fit within this definition of agriculture and forestry?

- **Policy P3 Countryside** – States that “development will only be permitted provided it requires a countryside location or where a rural location can be justified. This seemingly should enable an essential rural dwelling application; however there is no mention of the types of development that will be permitted under this policy.

Whilst there may potentially be a “route through” these various policies, from our perspective it is relatively unclear what the expected outcomes might be where a farm business legitimately requires additional residential accommodation to support their enterprise? We suggest that greater clarity is needed within the Plan to enable the development of essential rural workers dwellings as and when they become a necessity for those relevant businesses.

Our recommendation would be either that an SPD is provided which explains how farms can progress applications for rural workers dwellings, or that the aforementioned Policies H1, H2, P1, P2, P3 are amended to include specific mention of NPPF55 “the essential need for a rural worker to live permanently at or near their place of work in the countryside”.

Finally, we are extremely pleased to see the very clear support for rural growth and expansion that will be delivered through Policy E5: Rural Economy. We congratulate the evident integrated working that has taken place with the Enterprise M3 LEP Rural Action Group. However we are nonetheless concerned that such an aspiration to unlock rural economic growth may be constrained by uncertainty surrounding on farm residential development.
We trust that this comment can be taken into consideration and that the consultation draft can be amended prior to submission. In any case I would be very grateful if you could provide some feedback on my response in order that I might understand your thinking on this issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2678  **Respondent:** 11006209 / Terry & Serena Coates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Five-year Supply of Housing Land

The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan is therefore currently considered unsound in this respect.

Where there is scope to increase the quantum of development on previously developed land this should be considered and an adjustment made to the proposed allocation sites accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID:** PSLPP16/15327  **Respondent:** 11007393 / James Culmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3972</th>
<th>Respondent: 11008225 / Russell Pascoe</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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<th>Comment ID: PSLPP16/7582</th>
<th>Respondent: 11010401 / J M Bates</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. I object to the fact that Guildford Borough Council is choosing not to constrain its overall housing growth, as many other Councils have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford and therefore quite unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2053  Respondent: 11023585 / Jean Walker  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11681  Respondent: 11024257 / Jenny Richardson  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11686  Respondent: 11024257 / Jenny Richardson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Gosden Hill developement being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF. The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17805  Respondent: 11033921 / Tim Depledge  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Homes for all - I object - There is no need to meet an accommodation need specified in a document (the SHMA) which is neither transparent or reflective of current needs (especially considering the impact of the historic BREXIT vote in the recent referendum). I also understand that the basis behind the calculations, despite requests from some council members has not been shared.

Iunderstand that an independent planning consultant has prepared a report which casts grave doubt on the assumptions in the SHMA and this is referenced in the West Horsley Parish Council response.

The Draft Local Plan is written in such a way to say "the population will grow [which I dispute the volume], and we should therefore provide houses for these people". We live in a free market country, and live by the premise of supply and demand. There is not a requirement to simply "supply all" without consideration of how this is completely detrimental to all current residents.

Why should existing residents be impacted by provision of huge increases in housing being built for those who do not currently live in the Borough?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
the policy says that provision will be made for 13,860 new homes. However, I believe the need for this number is based on flawed assumptions and assessment of future needs in housing. The number of new houses proposed have been generated from a Strategic Housing Market Assessment mathematical model, which was not revealed in the plan. This housing target has then been increased further by Guildford Borough Council to give a population increase almost 70% higher than the official national estimates for population growth in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

• Social housing needs to be mandated as part of the H1 policy. Social Housing should not segregated from other developments. Mixed development has numerous benefits and should be supported by GBC.
• Affordable housing includes social housing but makes no distinction of percentages. 40% affordable housing is mandated and at least 20% of it should be social housing as a minimum.
• Great about student accommodation. The key thing is that student accommodation needs to be expanded beyond the University of Surrey to include other academic institutions such as Merrist-Wood College, ACM, Drama School and the University of Law.
• Overall the Local Plan should be considering house density, not number of houses. Look at how many people live there, not how many houses we build.
• All houses built should be of a good standard. The Local Plan should mandate Build for Life standard for all houses.
• All measures for carbon reduction must apply equally across the board. No distinctions should be made between housing and retail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1774  **Respondent:** 11036737 / Charley Penny  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I object to the imbalanced allocation of housing sites across the borough

The biased allocation of houses towards this area (over 40% of proposed homes are planned within 3 miles of Send Marsh) is completely unfair. Most of these houses are to be built on Green Belt (as we know it now) and will completely ruin the area. Removing these homes from the Green Belt, even with limited infilling as proposed for Ripley, will only lead to more homes being built and the problem increasing.

People who move to this area in the Green Belt should be safe in the knowledge that building within the Green Belt is limited and is to only be removed under exceptional circumstances, none of which have been proposed. The resources are not made for it, especially the narrow lanes where people cut through to avoid the A3 and to get to Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/14579  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

This policy does not set up any rules or constraints on building. There are no specific guidelines with regard to density and other important issues—no practical framework for planning decisions is provided. This free for all position should not be allowed because it cannot be tested objectively.
The residents of the borough need to be able to rely on a structure of a local plan where future planning decisions can be called into question.

I object to the proposal for housing based on out of date projections and on the SHMA which appears to be flawed and which has not been scrutinised properly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16515  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing mix as proposed was developed before Brexit and gives the impression is that the “evidence” documents have been prepared to set out a position rather than to provide a neutral, objective and balanced judgment upon which to make decisions. The SHMA was not put out for public consultation and was not scrutinized by Councillors. It full of assumptions and is unreliable. It appears that a very large number of planning permissions obtained by the University of Surrey for homes and development have not been used and this proposed policy should not even be considered until this has been resolved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1523  Respondent: 11036801 / Judith Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1 Homes for all

I object to changes in Policy H1 Homes for all because it has not addressed many of the 32,000 objections.

I object to the deletion of paragraph on density “New residential development is required….Higher density will be supported in Guildford town centre”.This deletion means that GBC have no intention of building at higher density in existing urban areas which is desperately needed.

I also object to the deletion of paragraph 4.2.8 on density as follows “We have a responsibility to use our natural resources, such as land, wisely……height of existing buildings and structures and materials”.

These deletions result in the plan having no density guidelines in the urban area.This is bad and irresponsible planning practice as it fails to exploit development opportunities that urban areas can afford.

I agree to the plan having some forward thought regarding higher density development for homes(not offices) e.g near the railway station area and Ladymead to help regenerate the town.

I object to changes in relation to student accommodation.
Clearly there should be a more robust policy that the University should accommodate 100% of new first year students and more than 60% of existing students on campus. This would free up many houses in the town for families. Surrey University has failed to use its existing planning permissions (dating from 2004) to accommodate 3000 students, or to improve efficient development of its extensive and underused surface car parks. It has 17 hectares of car park and student flats could be built here on stilts with car spaces underneath. If students were accommodated in this way 2000 homes would be freed up in the town and the Hogs Back would not be needed for housing.

I object to changes in relation to Gypsy, Traveller, Travelling show people pitches and plots. GBC already has a higher proportion of traveller sites than most other boroughs similar to Guildford. The over provision is inappropriate bearing in mind other constraints.

In particular I object to the inclusion of 6 travelling show people pitches at Garlicks Arch where there is no proven need.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/7320</th>
<th>Respondent:</th>
<th>11041121 / Catherine Dean</th>
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<td><strong>I object</strong> to Policy H1 for the following reasons:</td>
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<td>A much higher proportion of Surrey University students should be housed in university accommodation. The University has proved to be recalcitrant in providing accommodation in spite of outstanding Planning permissions. The policy does not do enough to rectify this.</td>
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<td><strong>I object</strong> to the increased numbers of Traveller pitches proposed. See my comment #9 in Policy S2 above.</td>
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<tr>
<th>Comment ID: PSLPP16/8764</th>
<th>Respondent: 11046593 / ANGELA GUNNING</th>
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<td>We are calling on the Council to evaluate high-rise, high-density buildings within the centre of Guildford before allowing development in the villages and in the Green Belt. Woking is a good example where multi-story buildings blend in to the city’s life and provide a young and vibrant population.</td>
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<td>We are calling on the Council to provide innovative housing accommodation for our young professionals such as purpose-built Multiple Occupancy Houses. Where the Local Plan identifies such accommodation may be created, we ask the council to use the Council’s building company to provide such accommodation for our residents.</td>
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<td>We are calling on the Council to provide social housing that addresses our current needs instead of mandating a 40% quota of affordable housing which may well not suffice. The “affordable” housing proposed by the Local Plan is not affordable for most of our residents.</td>
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<td>We are calling on the Council to provide accommodation suitable for our ageing population also and include policies that protect the existing bungalows used by our older residents.</td>
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<td>We are calling on the Council to ensure decent living standards for everyone by mandating that the 12 Building for Life principles apply to every housing development and only by exception allow developments not to meet these standards</td>
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</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4875</th>
<th>Respondent: 11047329 / Hazel Corstin</th>
<th>Agent:</th>
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<tr>
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I object as the housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12981  Respondent: 11047873 / Mary Waldner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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<th>Comment ID: PSLPP16/7581</th>
<th>Respondent: 11049473 / Victor Bates</th>
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</table>
### Comment ID: pslp171/245  
**Respondent:** 11051521 / J and M Baylis  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

New provision for self-build and for accessible accommodation noted. Removal of all density policy noted.

4.2.18 contains a reference to windfall sites for student accommodation. Windfall sites will also contribute to meeting general housing need. The Plan should take account of this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/12841  
**Respondent:** 11053825 / Claire Owen  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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**Attached documents:**

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### Comment ID: pslp171/992  
**Respondent:** 11053825 / Claire Owen  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

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<th>Comment ID: PSLPP16/9599</th>
<th>Respondent: 11053889 / Claire Handley</th>
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I also object to Policy H1 (HOMES FOR ALL) on the grounds that the Policy doesn’t set any constraints on building and the housing mix has been based on pre-Brexit growth and demographic assumptions which are now unproven and should be subject to review.

The draft Local Plan has failed to compel the University of Surrey to use its many planning consents and existing space, such as car parks, to provide required student accommodation. If the University were made to take responsibility for accommodating its students on the land which it already owns but fails to efficiently utilise, this would free up housing stock within the City to be utilised to answer any housing requirements identified by the Local Plan.

The proposals for development contained in the Local Plan impose a disproportionate amount (the majority) in Green Belt land and provides too few new homes in urban areas such as Guildford city centre where transport links are better and work opportunities are greater facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/3757  Respondent: 11069601 / Barry Kiddell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write in connection with the above.

I object to policy H1.

Having a policy of Homes for All is a complete nonsense when the type of housing that gets built is completely at the mercy of developers driven by profit, and the vagaries of the housing market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8824  Respondent: 11071553 / Nicholas Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 (HOMES FOR ALL) – I object because this policy doesn’t set any limit on building. Again, the housing mix is based on pre-referendum assumptions and a defective SHMA that the public weren’t consulted about and which was never scrutinised by Councillors.

This policy should make Surrey University provide all its students with accommodation by using thousands of planning permissions it already has and by using its existing space more efficiently (eg its half-empty surface car parks). That would free up many units of housing in the best possible place for the very people who need them most.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2370  Respondent: 11071553 / Nicholas Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• Policy H1 has deleted constraints on housing density, which ought to be a key part of any planning document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12394  Respondent: 11074465 / Louise Vaughan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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Attached documents:

Comment ID: PSLPP16/6496  Respondent: 11074561 / Tim Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**Comment ID:** PSLPP16/15866  **Respondent:** Neil & Nicki Covington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID:** PSLP171/2661  **Respondent:** Holy Trinity Amenity Group (HTAG) (Bob Bromham)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

P37. “A flexible housing stock will help meet the wide range of accommodation needs ...”. The balance of house sizes required is being disturbed by excessive extensions that create overlarge properties. We ask that a clause be added Large extensions will be refused if they would remove homes from the size groups in most demand.
P43. “Monitoring indicators - Permissions granted for different size and types of housing compared to the identified mix in the Strategic Housing Market Assessment”.

This must include extensions that increase the number of bedrooms in a house, if overall control is to be achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6843  Respondent: 11114721 / Elizabeth Wilcockson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/17410  Respondent: 11149217 / Royal Horticultural Society (RHS)  Agent: Montagu Evans LLP (Montagu Evans)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

RHS Wisley accommodates the main education and research function of the Society and the RHS School of Horticulture is based at RHS Wisley. This offers Diplomas in Horticulture and a Master of Horticulture. As part of its development, the Society is seeking to expand its educational activities further based upon its reputation as a centre of excellence for horticultural research. Volunteers, interns, apprentices and students all benefit from the Society’s work at Wisley through the programme that are run by the Society.
The RHS welcomes the inclusion of the reference to the RHS School of Horticulture at RHS Wisley at paragraph 4.2.16 as one of the further and higher education establishments located within the Borough. The Society see that accommodation for its own key worker staff is included in this category as a result of their staff development programme.

Within the previous representations (September 2014) it was set out that the RHS’s desire is in the long term to be able to provide additional student accommodation within Wisley Village with teaching and research facilities. The investment in student accommodation will complement the society’s aspirations to expand the range of higher education courses it offers. It is appreciated however that additional development is constrained by the TBHSPA and Green Belt policy, which will have to be addressed to enable this development to proceed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent: 11155713 / Andrew Bandosz</th>
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. Failure to provide student accommodation for Surrey University

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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LAND TO THE WEST OF SNELGATE COTTAGES, OLD EPSOM ROAD, EAST CLANDON, SURREY

I write on behalf of our client, Clandon Regis Golf Club, and as part of our continuing promotion of the above site through the Draft Local Plan, as a suitable site for housing in the light of the changes to Policy H1 (Homes for All).

It is noted, that not all the sites previously identified in the Draft Local Plan are coming forward in the amended Draft Local Plan to help meet the Council’s objectively assessed housing need. However, it is also noted that the Council is still required to demonstrate that the Plan makes adequate provision for its planned housing targets over the plan period. For this reason, it is contended that the above site should be considered for inclusion within the Site Allocations Document of the Draft Local Plan. The site is considered to be a suitably located and sustainable site on the edge of East Clandon.

For this reason, it is contended that the above site should be considered for inclusion within the Site Allocations Document of the Draft Local Plan. The site is considered to be a suitably located and sustainable site on the edge of East Clandon.

The site is in the ownership of Clandon Regis Golf Club, the land is surplus to the Golf Club’s requirements, and save for any proposed development scheme maintaining a reasonable buffer between it and the Golf Course, the proposal would not have any negative impact on the Golf Course.

In particular, H1 (9) seeks to make provision for self-build plots and custom housebuilding plots on smaller sites, yet the policy seems to focus and encourage more the provision self-build on strategic housing sites of 100 units and above, where a 5% allocation is sought.

It is contended, that more emphasis should be placed on facilitating self-build and custom housing provision of smaller sites coming forward for self-build housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

All housing should be designed so that it is suitable for all ages by, for example, the inclusion of bar handles or toilet blushing buttons that are not too stiff for old people to use. This would have no adverse impact on younger people in such
matters are generally simply an issue with good design. They need not bad to the cost of development they just require a little more thought prior to development in the more detailed specification; if such is required in this area it is likely to extend to other areas of construction resulting overall in a far better product. This is covered at 4.2.4 except that the word all is absent. The plan would be better if it were added.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2021  **Respondent:** 11160001 / Andy Freebody  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. I OBJECT to (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2532  **Respondent:** 11199841 / Woodstreet Village Association (Neville Byran)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The amended definition does not provide for enforcement or corrections for the previous under provision of student accommodation by the University of Surrey.
Housing targets should include the students, however due to restricted land supply, future expansion (and previous under build to 2003 commitment) should 85% be accommodated on the University campus. We are recommending at a minimum, 4500 student accommodation places to meet the 2003 plan proposals (not provided), plus 1 student place for each additional FTE student attending the University of Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1211  
Respondent: 11716417 / Solum Regeneration (Solum Regeneration)  
Agent: Nathaniel Lichfield & Partners (Dennis Pope)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Previously this policy in the 2016 PSLP stated:
"New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre."

Policy H1 in the 2017 PSLP has, however, removed the above text. As a consequence, the preamble which previously made reference to the need to use natural resources, such as land wisely, and which recognised that the efficient use of land is "essential", has also been removed. It is unclear what the justification is for removing this policy guidance given that making effective use of land, particularly that which is previously-developed, is entirely consistent with the NPPF (paragraph 17). Similarly, the removal of this policy guidance is at odds with the priority (stated in the Spatial Vision) to direct new residential to existing brownfield sites by making best use of previously-developed land in order to avoid the use of greenfield sites. If GBC is serious about these objectives, this policy guidance should be re-instated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/457  
Respondent: 11967745 / Terence Vincent  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16920  
Respondent: 12316001 / Vail Williams LLP (Jane Terry)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Policy H1: Homes for All requires new residential development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the Strategic Housing Market Assessment and should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location. The policy confirms the Council’s support for the provision of specialist forms of accommodation in appropriate sustainable locations and makes specific reference to some of these (students, travellers and HMOs). However the list is not exhaustive and by emphasising some and not others (for instance Custom and Self-build housing) there is a lack of clarity as to what the policy is actually seeking.

The reasoned justification in support of the policy, does refer to Self-build and Custom housebuilding at paragraph 4.2.12 but again, simply refers to having regard to the information on the register when carrying out … planning functions. It is also very broad brush in relation to making provision for Custom and Self-build only at the 4 strategic sites and unspecific in terms of the quantum sought.

It is very important that the Policy and Justification is completely clear on Self Build. It is growing in popularity across the country and in expensive areas will be one of the most affordable ways of getting on the housing ladder. Guildford Borough currently has new builds selling from £500-£700 per square foot with build costs around £160 per square foot. Self-builders qualify for exemption from CIL and government guidance on multi unit Schemes suggests that applicants should consider applying for a phased planning permission. With the relatively high rate of CIL proposed for the Borough this could become a very attractive proposition to landowners looking to increase their returns over what the housebuilders might typically pay for their land. At least some financial modelling should be undertaken to inform the Council’s precise policy and the potential impact for demand for multi unit self-build schemes that could technically avoid CIL contributions.

Without amendment to the reasoned justification the Council’s position is not clear. Would they support Self-build schemes on other allocated sites? If the council would not support Self Build schemes on other allocated sites then it is felt that the existing policy and wording is very restrictive and limits choice.

The Government have been very clear in their message and recent changes to legislation that they want to encourage the self build market as they see it contributing greatly to the country’s housing shortage whilst also helping the many smaller builders. Many councils have been very positive in their approach to self-build and in expensive areas like Surrey it is likely to become a very popular way for many to get on the property ladder. We consider that Guildford’s guidance is currently lacking in respect of self-build and would ask that this is reviewed prior to submission of the Plan to the Secretary of State.

The Council’s previous response to the Reg. 18 consultation stated that:

“Any site that is suitable for market housing is also suitable for self-build or custom housebuilding as this type of housing falls within the same planning C3 use class category”.

However, the justification in local plans also acts as guidance to the policies. In relation to Policy H1, the guidance indicates that self-build plots will (only) be allocated at the four strategic sites listed above.

In order to be completely clear about the council’s Self-build policy and the options available to self-builders and land owners alike it is considered that the reasoned justification at paragraph 4.12 should be amended to give clarity to this intent.

Additional comments on the adequacy of the Council’s approach to discharging its duty on Custom and Self-build are set out in the preceding paragraphs, in answer to Questions 1-3 of the Council’s questionnaire.

Accordingly we are seeking 2 key changes to the Plan in relation to Custom and Self-build:

1. A change to Policy H1 to specifically relate to Custom and Self-build;
2. A change to the reasoned justification at paragraph 4.12 in relation to Custom and Self-build; and
3. The specific allocation or safeguarding of one or both of our clients sites at Send specifically for Custom and Self-build to satisfy the demand in the early stages of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2373  Respondent: 14149857 / GBC (Caroline Reeves)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

The supply of a wide range of housing is an essential part of the plan, in all parts of the borough. Villages are in need of new, small, lower cost housing just as much as there is a need in the urban area. The policies appear to cover all styles and types of housing, the key will be when we have planning applications, that we are able to convince developers of our need rather than what will give them the highest return. What can be done to strengthen this? The need for ‘affordable housing’ is surely known by all, the difficulty is in the supply. As an authority we must continue to build social housing wherever we can, although the cost and supply of the land remains our biggest challenge. Central government policy does not help us in any regard with our housing issues, on the one hand demanding we build to meet our need and on the other proclaiming the need to protect the green belt. To fulfil the first demand destroys the other.

I particularly welcome the comments regarding the importance of the effect of HMOs on surrounding homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2433  Respondent: 14177313 / Ian Macpherson  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 38 para 4.2.8 Density

Not clear why this has been deleted, though some of the material is repeated elsewhere.

Obj. Replace please

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2474  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )
GVG is pro—growth and supports good, well designed development. Guildford Town Centre is about to undergo a sustained period of significant development, including creation of an additional 48,000sq m of retail and related space, principally via the redevelopment of North Street. Development includes additional new town centre housing, including much needed affordable, all of which we support. It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure. It is not clear what public benefits will accrue in the shape of new public space and better public realm. There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/8850 | Respondent: 15062081 / Chris Heath | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

There is no more housing needed for this part of

GBC has gone back on their word that they have listened to the people and have decided to take out much of the housing proposed for the Send area in the first version of the local plan. Yet they have now put in an even bigger number of houses that they labelled 'affordable'. These are not affordable to the young members of this community regardless of what the very cleverly questioned statistics provided. I have talked to many of the young first time buyers in this area and not many of them can afford to buy in the village they grew up in. Many are forced to move to the midlands or further afield due to this house price increase. The GBC is obviously aiming for the London buyers and as Woking is the commuter area and a logical area to attract London buyers they have decided to place Send and the surrounding area into a forced plan which will drive out the local residence and drive up the housing market.

I don't believe the housing numbers stated in the Strategic Housing Market Assessment 2015 (SHMA) to be accurate. It seems to use foreign students to increase the number of people needing housing and by my calculations, if we have a population increase of 20,000 in the time given in the plan, then the number of homes needed is more around the 8,000 area than the 13,860 the GBC have said.

This surly states that a large number of buyers will come from else where and not from this area. While I understand some housing is needed, the number proposed is ridiculous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp171/793 | Respondent: 15064673 / Steven Yadav | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/794  Respondent: 15081505 / Victoria Yadav  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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9 POLICY H1 HOMES FOR ALL

9.1 I object to policy H1 Homes for all.

9.2 Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

9.3 The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

9.4 I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 6/10 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London.

9.5 Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher
percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by
Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000
students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface
car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no
need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student
accommodation required on stilts with parking beneath.

9.6 Guildford borough already has a higher proportion of traveller sites than most comparable boroughs.
Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1.1 I object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000
objections made to the 2016 plan.

1.2 I object to the change by way of deletion of the paragraph on density: “New residential development is required
to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential
densities will vary dependent upon the local area context and character and the sustainability of the location. Higher
density development will be supported in Guildford town centre.”

1.3 This indicates that GBC have no intention of building at a higher density within the existing urban area which is
desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in
the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities
that urban areas can afford.

1.4 I support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20
minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks
(there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking,
as often seen on the Continent and, recently, in London.

1.5 I object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on
the University of Surrey eligible students population (full time equivalent) are expected to be provided with student
bedspaces on campus.”

1.6 The University should provide accommodation for 100% of new first year students and more than 60% of
existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford)
insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory
capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to
accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and
underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and
there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the
student accommodation required on stilts with parking beneath.

1.7 I object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford
borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate
given other constraints.
1.8 I object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need.

1.9 I object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.”

1.10 To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8909  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL):

- Policy doesn’t set any constraints on building.
- Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/236  Respondent: 15114529 / Phil Vowels  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The more I read of the plan, the more I see endless references to the “needs of travellers” or “students” or potential new residents – what about the needs of the existing communities??? What about the impact of more traffic and the destruction of priceless countryside? Why do you imagine people live here in the first place – precisely because these are villages and not towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/753  Respondent: 15114721 / Leslie Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
  i) to hide the number of houses actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and
  ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/600  Respondent: 15129281 / C Nicholson-Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

You have established a need over the entire Borough for eight plots or pitches for Travelling Showpeople to include storage facilities along with housing. Again, this not appropriate use of Green Belt land and furthermore why is 75% of this need included in your plans for Ripley? I object strongly to this unfair allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/116  Respondent: 15136513 / Ian Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

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This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Concerns regarding the number of properties planning on being built in both East and West Horsley.</td>
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<td>I have some fundamental concerns regarding the 2016 draft local plan.</td>
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<td>• The lack of any evidence for the alleged housing needs • The disregard for infrastructure needs to support these proposals, including overloaded schools, doctors surgeries, hospital capacity, roads and public transport • The erosion of the green belt</td>
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<th>Comment ID: PSLPP16/18695</th>
<th>Respondent: 15145377 / WYG (S Fidgett)</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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<td>Policy H1 Homes For All</td>
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<td>Generally, we support the flexible approach that this policy seeks to adopt, particularly with regard to housing mix and density which allow for greater consideration to be given to the characteristics and location of an application site. These aspects of this policy will help to ensure that new development complements existing built and natural environments.</td>
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<th>Comment ID: PSLPP16/614</th>
<th>Respondent: 15147201 / Mary Hollies</th>
<th>Agent:</th>
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<td><strong>is Legally Compliant?</strong></td>
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</table>
I beg you, before you start building new houses in East Horsley, you give a lot of thought and energy to building extra junior and senior school places, extra medical space and study to road.

Most roads are not wide enough for the huge lorries which now use them, so I suggest you ban them from such roads as Ockham Road South

Also keep in mind for every new house there will be at least 2 cars.

As East and West Horsley are after Effingham, for the Urban spread, please, please leave it as it is.

I know you have a difficult job but I beg you look ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
characterful Victorian family homes. In addition, the conversion of family homes into HMOs will naturally mostly occur in the town centre, where it puts undue pressure on the council's stated need to find new family homes. It would seem much more sensible and efficient to discourage conversion of existing family homes and thus enable new developments to focus on smaller units which are easier to fit into the townscape.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to raise the following objections to the above Plan:-

1. **Housing**

1.1. The target for new homes outlined in the Local Plan represents a 25% increase in the housing stock of the borough; The Office of National Statistics (“ONS”) projects a population increase (including that for economic growth) of some 15% for Guildford Borough over this same period. Why do we need the 25% increase in homes?

1.2. The infrastructure proposals are inadequate even to meet existing needs let alone the proposed additional developments in the Local Plan.

1.3. Policy S2: is a Borough Wide Strategy (the “SHMA”), which looks at how the annual housing target of 693 homes is made up. It estimates that 517 homes per annum arise from ‘the demographic figure (supported by ONS office national statistics) projections. To this GBC plan has added another 120 homes per annum in order to ‘support extra economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target more than in the rejected plan.

1.4. This does not make any sense as we do not need an uplift for extra economic growth. Current growth patterns are included in ONS projection.

1.5. The increase of 25 homes to ease affordability issues will result in only 10 social/affordable houses being built. It would be better if planning permission was only granted for 1, 2, 3 bed properties for a period of 2 - 3 years with a restriction on the percentage of 4 & 5 bed if required. This would help to provide a better mix for both market and affordable homes in all parts of the borough.

1.6. Student accommodation should be provided by the university. The University’s expansion should be in line with what it can deliver in terms of extra student accommodation.

1.7. GBC Affordable Housing Policy H2 is proposing that all development sites (other than those with less than 10 units) will be required to have 40% of their homes offered as affordable housing. This to be on all site irrespective of where they are or where the homes are most needed. Local authorities are able to take payments in lieu from developers, but GBC have rejected this option. Why? This “one size fit all” policy will mean that homes will be built where they are not needed and not enough will be built where they are needed. Developers are therefore able to influence the level and type of affordable homes built. The housing mix in the Local Plan suggests more 1-bed homes should be built than 2-bed. GBC have ignored the figures from their own needs data (where more 2-bed homes are needed) in favour of those produced by their external consultants report. These reports have been influenced not by sound internal data from their housing records but by the vested interests of the development lobby. The only changes that can be made to the number on each site is at the developers discretion and at their request. GBC are unable to promote changes.

1.8. If any affordable social housing is built in a village like East Horsley and on most of the sites in West Horsley they could be lost to the market as there is no rural protection against the right to buy or enfranchise.

1.9. Most of the social housing in EH has already been lost as a result of right to buy. GBC should take payment in lieu from developers and build the social affordable home in more urban areas where they are most needed

1.10. GBC’s new policies will encourage the buy to let investors who will receive a good return on their investment.

1.11. POLICY H3: Rural exception homes are required on a small scale and can be retained as affordable and built on the edge of village and have significantly less impact on the Green Belt.

1.12. I therefore **object** to the proposed housing numbers and policies based on the above points.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I OBJECT TO POLICY H1 (HOMES FOR ALL):
• Policy doesn’t set any constraints on building.
• Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I would like to raise the following objections to the above Plan:

1. Housing

1.1. The target for new homes outlined in the Local Plan represents a 25% increase in the housing stock of the borough; The Office of National Statistics (“ONS”) projects a population increase (including that for economic growth) of some 15% for Guildford Borough over this same period. Why do we need the 25% increase in homes?.

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1.3. Policy S2: is a Borough Wide Strategy (the “SHMA”), which looks at how the annual housing target of 693 homes is made up. It estimates that 517 homes per annum arise from ‘the demographic figure (supported by ONS office national statistics) projections. To this GBC plan has added another 120 homes per annum in order to ‘support extra economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target more than in the rejected plan.

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1.8. If any affordable social housing is built in a village like East Horsley and on most of the sites in West Horsley they could be lost to the market as there is no rural protection against the right to buy or enfranchise.

1.9. Most of the social housing in EH has already been lost as a result of right to buy. GBC should take payment in lieu from developers and build the social affordable home in more urban areas where they are most needed.

1.10. GBC’s new policies will encourage the buy to let investors who will receive a good return on their investment.

1.11. POLICY H3: Rural exception homes are required on a small scale and can be retained as affordable and built on the edge of village and have significantly less impact on the Green Belt.

1.12. I therefore object to the proposed housing numbers and policies based on the above points.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1730  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 -Homes for all

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

"5 This has been challenged by residents including, by Mr Ben as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model."
"6 See http://www.glheam.com/developer/Pages/Overview.aspx: we act for many of the leading developers. G L Hearn is now part of Capita Real Estate.

"7 See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016: "I would like to highlight the difference between the Objectively Assessed Housing Need (OAN) figure produced by G L Hearn (693 homes per year) and the Housing Target for the Local Plan. Some opponents of the Local Plan appear to blur the edges of the two figures. The OAN figure is the one produced by the modelling tool. The Housing Target figure is the proportion of the OAN that the Council feels it can successfully deliver. Based on the infrastructure that Highways England, Surrey County Council and others suggest they can provide over the next 15 years, the Council believes it can deliver the full OAN number as the Housing Target. However if, during this consultation, or later on, the anticipated infrastructure is not going to be provided then the council will be forced to apply further constraints to the OAN number, which may reduce the Housing Target number. Therefore, it is clear that the OAN and the Housing Target are not the same. The OAN is objective and the Housing Target is subject to constraints."

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1762  Respondent: 15245313 / C.A. Lindsay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing

H1 Homes for all

I object here again, because, again, we understand that the assumptions have not been scrutinised or evaluated – surely this should be basic. Please debate these very basic things; it is what we expect our Councillors to do. The University should be making arrangements for its students – this would avoid the loss of so much accommodation which families desperately need and the escalating prices which are already unaffordable to many.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1989  Respondent: 15245313 / C.A. Lindsay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
1. HOUSING POLICIES

This section provides comments on the housing policies set out in the Proposed Submission Local Plan.

POLICY H1: Homes for all

I support the general policy statements made in this policy, which are mostly repeating NPPF polices. My main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>I object to the hiding of development by “deferment” (A24, A25, A26, A43)</td>
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<tr>
<td>This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects: i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.</td>
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| Comment ID: PSLPP16/1953  Respondent: 15254785 / M.D. Vickers  Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy H1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| 1. I OBJECT(POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. |
| The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. |
| I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. |
| Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. |
| Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/1975  Respondent: 15255553 / J.A. Vickers  Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy H1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
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Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2006  Respondent: 15256833 / C J Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10472  Respondent: 15257281 / Kath Frackiewicz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The land held by Surrey University should be released to permit student accommodation to be built upon it. If students were accommodated in this way then the housing that they currently occupy in the Guildford area would become free and allow other people to live there or allow development of new houses. Again this must be implemented before any Green Belt land is developed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1077  Respondent: 15266273 / Danescroft Land Ltd Danescroft Send LLP  Agent: Pegasus Group (Mike Spurgeon)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1

5.1 It is notable that a paragraph has been deleted from Policy H1 (Page 35), which relates to density. The omitted paragraph states that:

“New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

5.2 The omission of this paragraph from Policy H1 and the supporting text in the form of Paragraph 4.2.8 are considered to detract from one of the core objectives of the Local Plan, which is to ensure that a sufficient number of new homes are provided in a sustainable manner, and that this makes efficient use of land.

5.3 While it is acknowledged that the requirement for making efficient use of land appears in Policy D4(1) Part (e)2, this reference to density in a policy relating to design, suggests that this is no longer a strategic objective. While the new policy approach in Policy D4 is welcomed, the absence of an explicit reference to providing new homes at an appropriate density at an earlier stage in the Local Plan suggests that this has become a lower priority for the Local Planning Authority. It is considered that planning for housing at an appropriate density and maximising the opportunities for providing new homes in relatively unconstrained locations are key to achieving sustainable development, particularly in the context of a Borough which is heavily constrained due to the presence of widespread Green Belt designations.

Please see attached for full context of representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


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Comment ID: PSLPP16/2199  Respondent: 15271841 / Carolyn Ramage  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

I agree that the Local Plan should focus on providing more affordable accommodation in Guildford and at least 40% of new build should be affordable. I think limited use of greenfield/green belt land is justified for the provision of affordable housing, and the sites proposed look reasonable.

I think that people who want to work in Guildford, e.g. At the hospital, should be able to afford to live in Guildford. I worry that increasing house prices will mean more commuters and less community. I also worry that it will lead to an even older population profile, and reduce the incentives for young talent to start or stay here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I cannot see any mention of housing association or council owned housing, which is critical for affordable housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. We support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. We do not understand what appears to be “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. We support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. We do not understand what appears to be “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I think there should be a greater bias towards homes in the town centre and more student accommodation on campus, as opposed to substantially increasing the number of shops in the centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2331  Respondent: 15278337 / Alastair Rutherford-Warren  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Homes for All, Policy H1 and H2

We agree with the objections of the East Horsley Parish Council to “one size fits all” policy of the Guildford Borough Council as it affects East Horsley, and we therefore object to Policy H2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1293  Respondent: 15278369 / Ripley Parish Council (Jim Morris)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2 Allocation A43 and amendments to Policy H1
2.2 Allocation A43 has been amended to include the provision of 6 plots for travelling showpeople. It is apparent that the plots will not only provide residential accommodation but will also seek to provide buildings and other storage and accommodation for vehicles, plant and equipment as winter quarters for travelling showpeople.

2.3 The site boundary of the Allocation has been modified to include an area of ancient woodland in the northern corner of the site and it is assumed that this would be the location for the travelling show people’s plots and other storage and accommodation.

2.4 Annex 1 Glossary of the Government Guidance on Travellers “Planning Policy for Travellers” 2012 identifies the fact that traveling show people often need mixed use “plots” to accommodate their equipment: “5. For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use plots for “travelling showpeople”, which may / will need to incorporate space or to be split to allow for the storage of equipment.”

2.5 However, policy makes no distinction between travelling show people and other travellers and gypsies, despite their different needs and makes it clear that local plans should seek to meet their needs working in collaboration with adjoining districts.

2.6 The Reg 19 draft Plan identifies a ratio of 1 traveller site per 500 new housing units. 500 units is the minimum site unit number to justify traveller site inclusion. The allocation A43 provides 6 travelling show people’s plots for an overall housing development of 400 units; a 750% increase over the policy H1 figure, if applied in this way, and representing the
major part of the 6-8 permanent travelling show peoples’ plots for the entire borough, on one site, in a location which extends the allocation site on land currently identified as Ancient Woodland.

2.7 The approach to allocation of travelling showmen plots within the site does not appear to be justified anywhere in the draft Plan, not is any basis for the selection of this site as being particularly suitable for such use.

2.8 Travelling showpeople have specific needs, including buildings and compounds for secure storage of large vehicles, plant and machinery. Their work and travelling is often seasonal but can lead to additional traffic, including the movement of very large specialist vehicles, plant and machinery which can cause substantial disruption.

2.9 The Parish Council considers that the most successful sites are stand-alone sites with direct access to major roads. The proposed location (probably in the far North corner of the site) is inappropriate, not only in that it affects land recorded as ancient woodland, but also because it is likely to be a poor neighbour to residential development of the kind shown and will probably require large commercial vehicles to use estate roads.

2.10 The combination of travelling showpeople’s accommodation and new general housing is an unsatisfactory one and is likely to impact on viability which will have consequences for the delivery of much needed affordable housing to meet, in particular, local needs. Attempting to tuck the use away in the far northern corner of the A43 site will not be a satisfactory solution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18681    Respondent: 15278465 / Chris Wright    Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2514</th>
<th>Respondent: 15280737 / Miller Developments (David Milloy)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )</td>
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<td>Clearly providing a wide variety of high quality homes that provide all tenures, types and sizes of housing to meet local needs is to be supported as this will go some way towards creating balanced, sustainable and inclusive communities as set out at paragraph 4.2.1. Miller does not seek to challenge the findings of the West Surrey SHMA 2015 in this regard.</td>
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<th>Comment ID: PSLPP16/17338</th>
<th>Respondent: 15280737 / Miller Developments (David Milloy)</th>
<th>Agent: The Chine Consultancy Advice Ltd (David Pugh)</th>
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<th>Comment ID: PSLPP16/10941</th>
<th>Respondent: 15282625 / Kelly Graves</th>
<th>Agent:</th>
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I OBJECT TO POLICY H1 (HOMES FOR ALL):
• Policy doesn’t set any constraints on building.
• Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Releases University from accommodating its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2582  Respondent: 15285121 / Audrey Boughton  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2597  Respondent: 15285345 / Mike Boughton  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14208  Respondent: 15299201 / Samira Abdullah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2821  Respondent: 15299425 / Tim and June Yorath  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all

We object to this policy.

A greater proportion than 60% of Surrey University students should be housed in university accommodation. The university should be encouraged through this Plan and the planning process to increase provision of university accommodation. It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2862    Respondent: 15300385 / Mark Harding    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to (POLICY H1 – Homes for all). Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim to be necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2875    Respondent: 15301089 / Brian Yeomans    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1: Homes for all

I OBJECT to this policy

The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated. I support high density development in the urban area. On campus dedicated student
accommodation should provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1279  Respondent: 15301089 / Brian Yeomans  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I accept the need for more housing, and particularly affordable housing, but there is substantial evidence that the numbers you base the housing need on contain major errors and substantially under-record outward migration. A more robust analysis is required to give confidence in the numbers.
- There is a fundamental and growing problem with congestion and inadequate infrastructure which is nowhere near adequately addressed by your proposals. Going ahead with the 2017 Plan will cause harm to the very qualities that underpin the economic success of Guildford and aggravate congestion.
- There are inadequate plans to create enough affordable homes. The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target will help by freeing up many more affordable homes relatively quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2953  Respondent: 15304897 / Richard Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car.
If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2999  Respondent: 15304929 / Rosemary Wood  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 - Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3429  Respondent: 15320737 / Steven Brown  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to POLICY H1 – Homes for all

- The policy doesn’t set any constraints on building.
- Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- I support higher density development in the urban area
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The University strongly objects to the elements contained within Policy H1 which require that 60% of FTE students be accommodated on Guildford Borough Council, the University and others can work together outside the Local Plan to encourage new entrants to join the rental sector in Guildford through non-affiliated Purpose Built Student Accommodation (“PBSA”) and more Private Rental Sector (PRS) housing. As a benchmark the University simply points out that it already provides more accommodation than do 95% of Universities across the nation, it plans to deliver 1,150 new units over the next three years and that it expects to deliver more in future as funds/circumstances permit to support new demand. The PBSA sector in Guildford, on the other hand, is virtually non-existent (c160 units at date). The clause is regarded as divisive, discriminatory, impractical and dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10271  Respondent: 15327073 / University of Surrey (G Q Max Lu)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The future development of the town and the University are closely linked and it is clear that their synergetic relationship can create even greater vitality and prosperity for the region. The University is committed to building on this relationship as the economy of the UK moves further towards the opportunities of science and innovation. For such an innovation-based future the Borough will require access to young talent, a sense of vibrancy that is attractive to young people, housing capacity, employent land for the technology, engineering and science sectors, and the infrastructure to help to support these aspects of economic development.

As Vice-Chancellor of the University of Surrey I should like to reiterate the importance of the Local Plan to the future of the Borough and the University and would urge the Council to adopt this plan after careful redrafting of Policy H1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3304  Respondent: 15327905 / Julia Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
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Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

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Attached documents:

Comment ID: PSLPP16/3791  Respondent: 15348033 / Peter Nicholas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1.

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Surrey University could provide accommodation for a far greater proportion of its students on its campus if it made more efficient use of its existing site, which would free up dwellings in the town for local people.

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1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF. The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond. Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants. The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley. If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

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Comment ID: PSLPP16/4078  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I OBJECT to Policy H1: you should compel the university to use its own space first of all to house students. This would surely have the effect of freeing up some housing space in town for those most in need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/546  Respondent: 15353633 / Neal Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I welcome the reduction in the number of new homes being proposed in West Horsley, but this does not go far enough in reducing the still very large number of properties proposed on the green belt in East and West Horsley. It also has the effect of making the eastern side of the borough take a greater proportion of the proposed developments.

Additionally, despite the reduction in proposed dwellings, there is no corresponding uplift in the sustainability of amenities, infrastructure or services such as shops, medical centre, library and Horsley Station proposed.

I also wish to note that Guildford is choosing not to constrain its overall housing growth like many other councils. I understand that the proposed dwelling building plan provides homes for a population estimate that is over DOUBLE the Office for National Statistics predictions for the same period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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13. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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Attached documents:

Comment ID: PSLPP16/4939  Respondent: 15381089 / Tim Poyntz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

12. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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<th>Respondent: 15381249 / Helen Poyntz</th>
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**Comment ID:** PSLPP16/5015  **Respondent:** 15382529 / Reuben Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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**Comment ID:** PSLPP16/5136  **Respondent:** 15386017 / Gareth Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5362   Respondent: 15390401 / William Stewart   Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5399  **Respondent:** 15390785 / Francesca Molossi-Murphy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/5397</th>
<th>Respondent: 15391041 / Anne Lawrence</th>
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| Comment ID: PSLPP16/5523 | Respondent: 15399041 / Sue Ely | Agent: |
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/5684  **Respondent:** 15406017 / Eleanor Roberts **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp171/298  Respondent: 15406145 / Paul Moore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5697  Respondent: 15406177 / Leonilla Frost  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy AH1 (Homes for All) & Policy H2 (Affordable Homes)

- Home Prices are already expensive here (homes are not affordable) and creating new development will not solve this problem.

- Numbers presented are pre-Brexit and therefore not accurate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5715  Respondent: 15406529 / David I Allan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6012  **Respondent:** 15420833 / Marjorie Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6049  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16854  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Attached documents:

Comment ID: PSLPP16/6151  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 - Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area to suit the aspirations of town dwellers. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students. This would free up family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, up to 2,000 homes would be freed up in town.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6204  Respondent: 15426305 / I C Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all

I object to this policy.

All the policy in the blue box says is that the Council will encourage building over the Plan period. It fails to provide guidance on important issues such as constraints and density and is not specific enough to provide a practical framework for planning decisions.
A much higher proportion of Surrey University students should be housed in university accommodation. The University has failed to provide sufficient accommodation in spite of the Council granting planning permissions. The policy does not do enough to rectify this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16528  Respondent: 15427105 / Helen Taylorson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

However I do agree that smaller homes need to be built as there are presently several large houses on the market that would appear to have been on the market for some time. The population is ageing and there is little provision of houses for the elderly. It is well known that the population of East Horsley is very active and that many activities take part in the village Hall – ie the centre of the village. The proposed site in Ockham road North appears to be a well sited area for homes for the elderly and for starter homes.

I feel strongly that consideration needs to be given to building a retirement village that would provide homes for the retired in the village but would enable far less use of cars. Any family homes built inevitably mean more cars and often not enough parking spaces

The Thatchers Hotel site or the Ockham road site would be perfect for a retirement village so long as the homes built were low and built in keeping with local architecture. There are many such sites in other counties – Linden Village Sunninghill, Berkshire Bramshott Place, Hampshire, Elmbridge Village, Cranleigh – all have been well designed and bring people of a certain age and time in their life together. Car ownership is discouraged and community transport is provided. Outings, hobbies, sports, interests are all encouraged on site enabling those recently bereaved or who find themselves single able to take part rather than living a possible lonely existence.

I would dearly love to see more thought given to retirement village living as being a useful solution to some of the housing needs in Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6268  Respondent: 15427617 / Ken Scotland  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

12. POLICY H1

I OBJECT to Policy H1 – Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
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It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6304  Respondent: 15428129 / K J C Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The University must be made to provide its own accommodation for students and staff and implement the planning already granted to them in 2003. This would release a considerable number of family homes in the borough. The impact of the University is a major issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6329  Respondent: 15428225 / Vian Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/396  **Respondent:** 15434433 / James Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?**  ( ), **is Sound?**  ( ), **is Legally Compliant?**  ( )

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1462  **Respondent:** 15437889 / Janet Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?**  ( ), **is Sound?**  ( ), **is Legally Compliant?**  ( )

The figure for housing need, though now reduced to 654, is still far too high and I support the serious challenge submitted by the GRA to the analysis produced by G. L. Hearn. I implore the council to look again at this figure to ensure that it accurately represents real identified housing need for our borough alone before our countryside and lovely town are ruined for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/2722  **Respondent:** 15438049 / David A Sprigings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? () is Sound? () is Legally Compliant? ()

1. I object wholeheartedly to the Guildford Borough Council Proposed Submission Local Plan 2017 as the information in respect of the total number of new homes required for the plan, perhaps the most important overall issue, is confusing, contradictory and, in some cases, misleading. For example:

a. Point (1) of Policy 52 on page 30 says "During the plan period (2015-34) we will make provision for at least 12,426 new homes ..." This at least agrees with the Target figure for the number of new homes permitted and completed, under Monitoring Indicators on page 34 and the total of the Surrey Housing Market Assessment (SHMA) for Guildford.

b. However, whilst 4.1.9a at the foot of page 30 says "The figures set out in the Annual Housing Target table (above on the same page) sum to a total of 12,426 homes" this is not correct. The figures in the Annual Housing Target table on page 30 total 9,810, not 12,426. This causes confusion and is misleading. It appears to be because the Annual Housing Target table covers 15 years from 2019/2020 - 2033/2034. Dividing 9,810 by 15 (the number of years) gives an average of 654 pa, the same as the average for 19 years in the Guildford SHMA. The difference between 12,426 and 9,810 is 2,616 which presumably is the total for the 4 years 2015/2016 - 2018/2019 to agree with the total of 12,426 for the 19 year plan starting in 2015/2016. The figure of 2,616 for 4 years also represents an average of 654 pa. This contradicts the statement on page 31 of "a phased target that gradually increases over time ...." Although there is a gradual increase from 450 in 2019/2020 onwards, the figure of 450 represents a decrease of 31% from the average of 654 for the 4 earlier years of the plan. This is both misleading and very confusing.

c. The total for 2017 in the column Gross number of homes (approx.) over the plan period in the listings on pages 142-145 is 11,350, a totally different figure to the 12,426 found elsewhere with absolutely no explanation of the difference. The major reason for the difference seems to be that the figures quoted for site allocations A24, A25 and A26 in the listings are significantly lower than the total on the detail sheets for these site allocations/policies:

POLICY A24: Slyfield Area Regeneration Project, Guildford. "Approximately 1,500 homes of which 1,000 homes (C3) will be delivered within the plan period". The figure 1,500 is in red and so a change (an increase of 500) from the 1,000 which was the equivalent figure in the 2016 plan analysis. This is both very misleading and very confusing as the figure of 1,000 on page 143 is in black and shows no change, thereby hiding the overall increase of 500, with an apparent deferment of 500 beyond the plan period..

POLICY A25: Gosden Hill Farm, Merrow Road, Guildford. "Approximately 2,000 homes of which a minimum of 1,700 homes (0) will be delivered within the plan period ...". "Of which a minimum of 1,700 will be delivered within the plan period" is all in red and so a change from 2016, whereas page 143 shows 2,000 crossed out and replaced by 1,700. This is also very misleading and confusing as it makes it look as though there is a reduction of 300 from 2016 to 2017 whilst the overall figure is unchanged at 2,000, with an apparent deferment of 300 beyond 2033/2034.

POLICY A26: Blackwell Farm, Hogs Back, Guildford. "Approximately 1,800 homes of which a minimum of 1,500 homes (0) will be delivered within the plan period". 1,500 and the related text are in red so a change from 2016 and again what appears to be a deferment beyond 2033/2034 being made to look like a reduction in the total, which it isn't. There are also numerous instances of Gypsy & Traveller pitches and also Travelling Salespeople plots being omitted from pages 142-145 though the numbers are much smaller, totalling 38. I find all this unacceptable and so I object to the plan as a whole.

2. I object to the plan as a whole because of the unjustified focus of planned new homes in the Ripley! Send Marsh/ Burntcommon/Send area and localities as more than 40% of the total for the borough is within 3 miles of Send Marsh.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY H1 – Homes for all

- The policy doesn’t set any constraints on building.
- Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- I support higher density development in the urban area
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7045  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**12. POLICY H1**

I OBJECT to Policy H1 – Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14358  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL):

• Policy doesn’t set any constraints on building.
• Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7416  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7417  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7418  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7420  Respondent: 15448449 / Carol Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7464  Respondent: 15448897 / Ruth Brothwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford’s housing requirements seem confusing as the basis for calculations has not been disclosed. Guildford attracts and maintains a mature and more wealthy citizen. Whilst the aim to provide housing for the younger generation is of course essential and well intentioned there does not seem to be any correlation between the proposed future prosperity of the borough and the looked for increase of workers in the borough doing the jobs and earning the wages we see advertised. I worry that older, wealthier people will move out as a result of the changes proposed and be replaced by low paid individuals who will be less able to contribute to the overall economic sustainability of the borough. There is a lack of information concerning the jobs and work that would be undertaken and mention of employment by local hospitals and care homes is clearly a statement of intention to attract low paid workers requiring very low cost housing.

Policy H1 of the Local Plan (Homes for all) sets out to ensure new development provides a mix of housing tenures/types/sizes, appropriate to the site size, characteristics and location, with a view to meeting the accommodation needs established by the latest Strategic Housing Market Assessment (SHMA). It says that as well as the benefits it can provide to people’s lives, families and communities, suitably sized, priced and located housing can also help to support the economy by ensuring people with a wide variety of occupations can live in the borough. I refer to comments above concerning the availability of jobs and their wages in order to affirm this aspiration. Is there any assurance that the houses proposed will be low cost? (This is not the usual experience in the borough nor of the intentions of developers as can be seen by very recent small development within Ripley and Send. New cottages built in Newark Lane cost in excess of...
A large area of low cost housing suitable for low paid residents does not fulfill the aspiration of supporting the economy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7619  Respondent: 15450817 / Audrey Gachen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY H1 – Homes for all

- The policy doesn’t set any constraints on building.
- Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- I support higher density development in the urban area
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- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7725  Respondent: 15451713 / Gaby Attwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford Borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7742  Respondent: 15451905 / Jonathan Withers  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7763  Respondent: 15451969 / Rosie Lee  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Thank you for giving the Surrey Gypsy Traveller Communities Forum (SGTCF) the opportunity to comment on the above Plan. Mrs. Hilda Brazil, the joint Chair of the Forum, has already taken the opportunity to address Councillors at the EAB Committee held on 13th April 2016, about the pressing need to meet the accommodation requirements for Gypsies and Travellers within the Borough. We hope that this has helped to increase awareness of our needs and the way in which provision for Gypsies and Travellers in the past has been wholly inadequate.

We very much hope that this Local Plan offers a turning point and that our needs are satisfied in the future. The SGTCF welcomes the Council’s commitment to meet the accommodation needs of Gypsies and Travellers, and we are willing to assist in any way we can in order to increase participation and awareness of planning issues within the Gypsy and Traveller Community.

The SGTCF would like to submit the following comments in response to your proposed submission local plan.

**STRATEGY**

**Policy H1: Homes for all**

The SGTCF support the commitment of the Council to identify sufficient sites for Travellers' accommodation needs as set out in the latest Traveller Accommodation Assessment. We welcome the fact that these sites will be for a mix of tenures and provided on a number of small sites.

We also support the Council’s commitment for all new sites to have adequate utility services and amenity space, space for related business activities where appropriate, safe vehicular access, turning space and parking and that these sites should be in areas with reasonable access to schools, health services and local services.

Providing Traveller accommodation on development sites of 500 homes or more will help in the provision of land to meet needs. However, the location of accommodation within these larger development sites should be treated sensitively and considered in full consultation with the local Gypsy and Traveller community.

Should any of these larger development sites not go ahead, the plan should include contingency measures in order that the needs of Gypsies and Travellers can still be met in other ways.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPP16/8010  Respondent: 15458081 / K C Meldrum  Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Policy H1- the University of Surrey should be required to build more than 60% student accommodation and to make full use of the planning applications that have already been approved for student accommodation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: pslp171/880  Respondent: 15458081 / K C Meldrum  Agent:**

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This still proposes to inset East Horsley from the Greenbelt. The development of 100 homes is proposed near Horsley station and over 2000 on the Wisley Airfield. The village of East Horsley (and surrounding villages such as West Horsley, Effingham and Ripley) do not have the infrastructure in terms of transport (roads, parking or rail), schools or medical facilities to adequately meet this increased demand.

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land is land that was supposed to be protected for future generations.

Since Brexit, forecasts of increasing population numbers have been significantly reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.2.1 We question the wisdom of adding you want to meet “demand”. For example, there has been demand by foreign investors for homes to be bought as an investment and left vacant.

“Development that results in the net loss of housing or specialist housing, including sites allocated for housing within the Local Plan will not be permitted.”

This should be qualified with ”normally”. It will be necessary to be able to make adjustments to the number of homes given permission “in principle” or in outline where a site survey shows that the envisaged number of units cannot be accommodated without causing unacceptable impact (eg space is needed for sustainable drainage). Also, within the context that some town centre properties are changing from business to residential, it may be appropriate to make some changes from residential to business. In some instances, it may not be inappropriate for a house in multiple-occupation to be reinstated as a family home.

Density- Policy and Justification
We strongly welcome this approach with an overall presumption and decisions taken on what is appropriate on a case by case basis. This has been a game changer in enabling positive schemes in Guildford. Previous targets were too blunt to be useful having no relevance where higher densities could be achieved and driving harmful schemes and avoidable appeals in those instances where a lower density was appropriate.

Students

“We expect 60 per cent of the University of Surrey eligible student population (full time equivalent) to be provided with student bedspaces and accommodation on campus.”

This percentage is far too low given the mix of pressures on Guildford as a university, London commuter belt and constrained gap town. We have a thriving University that is an engine for our economy and also for population growth. With that comes responsibility. We ask the University to provide far more campus accommodation making it attractive so 80-90% of their students will want, and expect, to live on campus. This will free up much needed affordable homes in the town. (See comments on Soundness and Annex 3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2695   Respondent: 15460737 / Donna Collinson   Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are still fundamental flaws with the latest draft of the proposed Local Plan that need rectifying.

Members of Stoke next Guildford Residents Association, are so concerned about the local plan they contributed twice to the Guildford Residents Association fund to hire expert Neil McDonald.

Please find attached latest version of Neil McDonald’s report. It has a minor addition on pages 19 and 20 which advises ONS has said there is an issue. This further strengthens the case for revising the Guildford population change projections ie the demographic housing need..

Behind the scenes Neil has had his report peer reviewed and agreed in various quarters. You may like to be aware that the Waverley inspector accepted Neil’s demographic analysis as opposed to that of GL Hearn, which lends further weight to his Guildford analysis.

A report from the Protect Our Waverley campaign group on the Waverley Plan Inquiry is well worth a read. It is available on this link: http://powcampaign.org/report-examination-public-27th-june-6th-july

From this link you will also see that GRA concern about Guildford being asked to meet Woking’s unmet need was borne out at the Waverley Inquiry. This increases the importance of applying constraints in Guildford prior to Plan submission (just as Woking did).

Stoke next Guildford RA located just south of Stoke Crossroads predominantly Josephs Road and north Stoke Rd is an area where residents suffer the worst air quality almost 29 times more polluted than anywhere in Guildford except the town centre traffic lights, a Surrey University study revealed in 2015.

This far exceeds EU safe limits !

Traffic pollution was recently placed in the top ten health risks faced by human beings globally, with the World Health Organisation linking air pollution to seven million premature deaths every year,” said lead author of the research, Dr Prashant Kumar, from the University of Surrey.
At the town centre stakeholder meeting briefings of 21.7.17 it was revealed the proposed Sustainable Movement Corridor and the LEP proposal has been watered down and will be incapable of delivering the modal shift and reduced congestion required. Also without an A3 tunnel which would have linked benefits for the entire Enterprise M3 area, ie not just Guildford, increased congestion would add further to air pollution in neighbouring areas, which already exceeds safe EU limits.

See attached report by GRA Transport expert, Richard Jarvis’s updated comments on the transport aspect of the Plan which support the case that transport infrastructure is a constraint even with all the proposed measures.

Stoke next Guildford RA most strongly urge the council to use all available constraints including transport infrastructure in the local plan for congestion fuelled air pollution reasons. Residents frequently cannot exit onto Stoke Rd as the congested traffic from the lights tails back to the Guildford College roundabout and Guildford is already euphemistically known as a car park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Review of GL Hearn's Guildford Addendum to the West Surrey SHMA Final SV.pdf (1.2 MB)  
- Local Plan GRA Last Chance Response Flyer 2017 sv.pdf (462 KB)

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Comment ID: pslp171/1997  
**Respondent:** 15461793 / Paul Smith  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that developers will use land inefficiently, putting additional pressure on the countryside and un-developed land. This deletion is inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: pslp171/1467  
**Respondent:** 15461889 / Jasper Collinson-Warr  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/8210  
**Respondent:** 15462337 / Shirley Smith  
**Agent:**
60% of students should have accommodation on campus to reduce the pressure on housing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

13. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8424  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL):

- Policy doesn't set any constraints on building.
- Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn't put out to formal public consultation and wasn't scrutinized by Councilors.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8508  Respondent: 15468673 / Claire Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are already travelling home sites in Normandy and 6 more would be excessive to the area

I disagree that the area needs more homes and the loss of country side and use of green belt will be detriment to the area, which is currently a small village location. We already have community facilities in Glaziers Lane and with Normandy cricket and tennis Clubs which serve the area and a secondary school is not required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over provisions inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8605  Respondent: 15472097 / Bernard Eyre  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan peri It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over provisions inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8693  Respondent: 15474849 / Timothy Yorath  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy H1 - Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8910  Respondent: 15478017 / Kirstie Pankhurst  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL):

• Policy doesn’t set any constraints on building.
• Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9014  Respondent: 15478177 / Michelle Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1444  Respondent: 15478529 / David N Ross  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register with you my objections to the revised local plan. My overriding concern is the sheer number of houses you propose building. I have seen nothing in your communications that explains why you think this huge number of homes will be necessary over the coming few years. Your figures for likely need are far in excess of even central government predictions and I find myself wondering where all these new residents are going to earn a living. Our local employment is not sufficient to take the extra number of people you are planning for, nor will our local transport and train service manage to carry them all to London for work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/541  Respondent: 15479681 / George Smith  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9322  Respondent: 15481409 / Amy F Corstin  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9510</th>
<th>Respondent: 15482817 / C.E. Pullen</th>
<th>Agent:</th>
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<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Attached documents:

Comment ID: PSLPP16/9506  Respondent: 15483009 / S Acomb  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Attached documents:

Comment ID: PSLPP16/9741  Respondent: 15485665 / Lynne Davies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The University of Surrey should be building the necessary student accommodation (that they promised in 2003) so that they do not overspill into the town, thereby distorting the required housing figures. The University impact does not appear to be managed in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9782  Respondent: 15486017 / Neil Higgins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
- I object to the Local Plan focusing upon the wrong type of housing requirements – Why does the Plan not include the amount of Social Housing which is so desperately needed – “Affordable Housing” is not attainable by so many within the Borough – The needs of all residents should be being addressed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10025</th>
<th>Respondent: 15495873 / Gerard Duvé</th>
<th>Agent:</th>
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Homes For All: I object to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not done so. Freeing up private housing in the town currently used for student accommodation would mean availability for those requiring affordable housing. A new development at Blackwell Farm (2,000 houses) providing accommodation for students is a selfish move by the university.

After the 1st World War ‘Homes for Heros were provided countrywide, as was the case for council housing after the 2nd World War. I believe GBC should adopt the same strategy, even in areas of AONB albeit on a reduced scale, to provide sustainable homes alongside current housing for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10216</th>
<th>Respondent: 15497505 / Jyoti Nanda</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10294  **Respondent:** 15501057 / Spelthorne Borough Council (Geoff Dawes)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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. 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.

This Council also welcomes the fact that Guildford is seeking to meet 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.

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.

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10615  **Respondent:** 15502209 / Shirley Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy HI- Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10618  Respondent: 15502241 / Richard Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to GBC withholding from residents their consultant’s and sub-consultant’s calculations of housing need, which is what is driving this whole issue. It would appear that even some individual councillors are not privy to the calculations or how the total has been reached but are blindly accepting a figure produced without workings or explanation. There are strong grounds for believing that GBC, aided and abetted by their consultants, have overstated by a wide margin what the figure should be. There are also grounds for believing that the numbers have been exaggerated as a result of pressure from developers. As the grabbing of Green Belt land is predicated on the need for a particular number of houses, a good starting point would have been to get the number right and to show transparently how it was reached.

Other submissions will provide supporting statistics and there are authoritative figures online to show the escalation of housing need in Guildford Borough has been about 0.5% per year for the last ten years. The draft plan provides no proper data which proves that it is increasing significantly more at the moment or that in future years it will rise by so much more. Guildford’s projected number in the last draft local plan was challenged by the Office of National Statistics which is a more reliable source since it is not driven by developers. Since the current set of figures was published other underlying data has changed; for example it was too late to take into account the effects on housing demand of changes to the population which could arise from Brexit. Nor has GBC applied the normal constraints to their maximum projections. For a proper professional assessment of housing numbers I refer the reader to the submission from Andrew Procter on behalf of the Save Send Action group.

I OBJECT to the combined total of 2000 (Wisley) + 485 (Send) + 2000 (Gosden Hill) + 1850 (Blackwell Farm) houses all alongside a short stretch of the A3 between the M25 and the university. To concentrate 6335 of the borough’s assessed need for housing of 13860, that is close to half of it, in such a small area of the borough is by any standards unreasonable. If GBC wants to build this number of houses, which has more to do with developer pressure than properly calculated need, it should spread them more evenly throughout the borough, which it is manifestly failing to do. This would help to alleviate excessive traffic congestion and pollution which is a certain consequence of GBC’s current proposals.

Applied specifically to Send, although it is the largest village in the borough it should not have to take a significantly higher proportion of new houses than the borough overall. It should also not have to take a significantly higher proportion of new houses on account of its current size which arises as a result of a disproportionate volume of housing previously being located in Send, Send Marsh and Burnt Common. When the Wimpy Estate of several hundred houses (Linden Road, Maple Road and all adjacent “tree” roads) was built in Send some 40 or more years ago it represented a massive increase in the size of Send Marsh which increase at the time was disproportionate to the size of the village and its amenities. A further massive increase now, which relates numbers proposed to numbers existing, compounds the offence. It would be more equitable to say that as Send accepted a very large number previously, it should not be expected to do so again.
The housing number calculations also have to take into account the constraints, in particular those resulting from the Green Belt. I therefore repeat the points made in paragraph 11 above which cannot be over emphasised. The NPPF states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10546  Respondent: 15504001 / Margaret Banks  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Attached documents:
Comment ID: PSLPP16/10794  Respondent: 15506241 / Penny Whitlock  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

If houses are built I would want social housing where there is a need, not housing for profit

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11072  Respondent: 15509057 / Richard Golding  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object, this section seems to be a wish list there is no detail on how this is to be rolled out or how or when certain area will be developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11236  Respondent: 15570145 / Owen Eszeki  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1 - Homes For All

I object to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not done so. A new development at Blackwell Farm (2,000 houses) is not required to provide accommodation for students.

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Attached documents:

Comment ID: PSLPP16/11242  Respondent: 15570209 / Emily Cross  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Attached documents:

Comment ID: PSLPP16/15326  Respondent: 15570817 / Tom Edelsten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Attached documents:

Comment ID: PSLPP16/15328  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Attached documents:

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**Comment ID:** PSLPP16/11435  **Respondent:** 15571425 / Monika Neczaj  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT TO POLICY H1 (HOMES FOR ALL):

- Policy doesn’t set any constraints on building.
- Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/11480  **Respondent:** 15571553 / Darren Carbine  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all - I OBJECT.

It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. [http://www.glhearn.com/developer/Pages/Overview.aspx](http://www.glhearn.com/developer/Pages/Overview.aspx); “We act for many of the leading developers.” G L Hearn is now part of Capita Real Estate. 7 See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016: “I would like to highlight the difference between the Objectively Assessed Housing Need (OAN) figure produced by G L Hearn (693 homes per year) and the Housing Target for the Local Plan. Some opponents of the Local Plan appear to blur the edges of the two figures. The OAN figure is the one produced by the modelling tool. The Housing Target figure is the proportion of the OAN that the Council feels it can successfully deliver. Based on the infrastructure that Highways England, Surrey County Council and others suggest they can provide over the next 15 years, the Council believes it can deliver the full OAN number as the Housing Target. However if, during this consultation, or later on, the anticipated infrastructure is not going to be provided then the council will be forced to apply further constraints to the OAN number, which may reduce the Housing Target number. Therefore, it is clear that the OAN and the Housing Target are not the same. T

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11514  **Respondent:** 15571617 / Bruce Garbutt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object regarding the inadequacy of the Homes for All policy – Policy
- Leaving aside the numbers issues (see 1-3 above), all the policy in the blue box says is that the Council will encourage building over the plan It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
- The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated (see above).
- I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial
- Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking as often seen on the Continent and, recently, in
- Expansion plans by the University of Surrey should be adequately funded to include student accommodation for 100% of new students and should not simply rely on the Guildford area to make accommodation The university campus has sufficient space for their necessary accommodation – they should not be preserving their environment at the expense of the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11772  **Respondent:** 15571617 / Bruce Garbutt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1 – Homes for all

I object to Policy H1 for the following reasons:

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the Plan period. It fails to set rules on important issues such as constraints and density and is not specific enough to provide a practical framework for planning decisions.

A much higher proportion of Surrey University students should be housed in university accommodation. The University has proved to be recalcitrant in providing accommodation in spite of outstanding Planning permissions. The policy does not do enough to rectify this.

I object to the numbers of Traveller pitches proposed to be included automatically and pro-rata without any demonstrated level of need in each location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11591     Respondent: 15571937 / S Bennell     Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/907  Respondent: 15572225 / Rob White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

University of Surrey

Have the people of Guildford ever been asked if they are happy with the expansion of the University of Surrey? No.

As it grows it is just adding further pressure on the housing stock within Guildford, so stop any further expansion without consulting the people of Guildford as to whether they are happy with it and explain the impact of that development.

The University should be housing the majority, at least 80%, of its students within the campus and base any expansion on being able to achieve this.

Before you start saying they bring employment to the borough, I would disagree. I spent 40 years in the IT industry from 1976, when I trained at Guildford Tech, until this year and I never saw any opportunities from the University or the companies around the hospital. What I did see suggested that the recruitment was being done in India as was becoming common across business from the early 2000s. In all my time in the industry I only met 1 person that had ever worked for a company based up near the hospital and university.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11615  Respondent: 15572353 / Dianne Kashel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

If houses have to be built locally they should first be made available for local people so that family ties and friendships can be maintained, helping to build social cohesion. Sadly, this has not happened in Cranleigh where new housing has been offered to people from the other side of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/11796  **Respondent:** 15574913 / Peter David Sheppard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Send Hill and Clockbarn Nursery developments I support providing there is adequate provision for children of Send village to acquire properties as currently no young people can afford to buy in Send. I feel more should be done by Guildford Borough Council to provide housing in Send with a suitable covenant that they can only be bought by people with a long standing connection with Send village - by this I mean not only when new but also when resold.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/11844  **Respondent:** 15575009 / Tony Redknap  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object (POLICY H1 – Homes for all)

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12020  **Respondent:** 15578977 / Norman Evans  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Every university has a basic duty to provide as much accommodation for its students as possible. Surrey University already has planning permission for a thousand or more housing units for student accommodation and has other land in its campus which could be used to house its students. If the University implemented its permission and built further accommodation, it would release thousands of housing units in the town for ordinary residents. Its proposal for building on Blackwell Farm is opportunistic and profit-seeking, destroying Green Belt land on Hog’s Back, a well-known scenic attraction. A recent independent survey has concluded that the Blackwell Farm site should be included in the AONB: I agree.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12062  **Respondent:** 15579361 / Caroline May  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

14. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12088  Respondent: 15579489 / Ben Palmer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12112  Respondent: 15579649 / Peter E May  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
13. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/12242  **Respondent:** 15581665 / Laura Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. This is another serious flaw in the plan.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12350  Respondent: 15582593 / Dermot McMullan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/12415  Respondent: 15583169 / Poul Jensen  Agent: Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1658  **Respondent:** 15583841 / Catherine Young  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to Policy H1 where the constraints on housing density have been deleted. This leaves all villages and other areas in the Borough extremely vulnerable to developers needs. Density guidelines should be a key part of any planning document and therefore this should be reviewed and added back in to the proposed Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/528  **Respondent:** 15584033 / Andrew Hutton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose. GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

**Under the Draft Local Plan Strategic Policies 41/S1/4.1.1 GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.**

**House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017**

**Guidance on taking account of constraints.**
“need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

“The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account 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.” (P d055 ref ID.3-045-20141006)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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SHMA

I object to the fact that research resulting in the SHMA has not been made public

GBC have broken a lot of rules in preparing the SHMA.

They subcontracted to GL Hearn, who subcontracted the work to Justin Gardner. This was against their own rules. Justin Gardner then claimed that the research which led to the numbers of houses needed was their “intellectual property”, therefore they were not obliged to share this information with anyone, not even the Councillors! Mr Spooner, Leader of the Council, claims not to have seen the research. How can he and his executive team make any reasoned decision without seeing the evidence?

The document Strategic Housing Market Planning states that consultants “should ensure that there will be no data protection or commercial restrictions on the storage and sharing of data used in the assessments”. This was not done

The Strategic Housing Market Assessment Practice Guidance document V2 Aug 2007 (1.1.2.5) states that “assumptions, judgements and findings are fully justified and presented in an open and transparent manner.” This has not been done.

These last two points have been entirely and ruthlessly ignored by GBC as they have refused on many occasions, even when information was requested under the FOI Act to divulge any research.

With regards to the student numbers in Guildford, the fact that most of them leave and live elsewhere, after finishing their degree, has not been taken into consideration, and plans to accommodate students have skewed the numbers of houses required by the GBC, probably by about 25%.

The University should be forced to build the student accommodation for which it was given land and building permission. GBC should not allow any further increase in student numbers, nor any further buildings on the site, until the university has fulfilled their agreements regarding student accommodation. This would release large numbers of inexpensive flats in Guildford for local occupation and reduce the numbers of houses needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12663  Respondent: 15584961 / Helen Meredith  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H1

I object to Policy H1 – Homes for all. The policy says that the Council will encourage building over the plan period. It fails to set rules on constraints and density and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development in the urban area. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking. The University of Surrey has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. It is therefore not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the University's ability to house its own students and reduce the housing number accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12733  Respondent: 15585441 / Laurie Will  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

13. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

14. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12769  Respondent: 15585601 / Sophie Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12915  **Respondent:** 15586017 / C Maslin  **Agent:** 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY H1 HOMES FOR ALL**

I object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of ‘regulatory capture’ by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12901  **Respondent:** 15587105 / John Downes  **Agent:** 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
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The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.
The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12897  **Respondent:** 15587137 / John Oliver  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy H1**

This policy, significantly, omits mentioning young, single people. Their housing needs are not being met by the Plan. Even “affordable housing” is simply beyond their reach in this area. This is a crucial omission as the Plan makes a point of the fact that there is a skills shortage in the area. There must be a direct correlation between this and the lack of availability of truly affordable housing. Young people are moving away.

“We want a flexible housing stock that helps meet the wide range of accommodation needs so we will expect new homes to be flexible, accessible, adaptable and age friendly.” This sounds fine, but where are the developers who will design cheap and acceptable (in the planning sense) houses for young individuals and young couples? GBC, quite rightly, states that any development must be of high quality. But quality comes at a price that young people simply cannot afford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13026  **Respondent:** 15587361 / Aileen Creegan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Policy H1**

This policy, significantly, omits mentioning young, single people. Their housing needs are not being met by the Plan. Even “affordable housing” is simply beyond their reach in this area. This is a crucial omission as the Plan makes a point of the fact that there is a skills shortage in the area. There must be a direct correlation between this and the lack of availability of truly affordable housing. Young people are moving away.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The housing need has been reviewed, but only reduced by 5% (from 693 to 653 per annum). Guildford Borough Council (GBC) has not provided information supporting these figures. Without this, their credibility is in question. Furthermore, the independent survey, commissioned by Guildford Residents Association, concluded an annual build of 404 homes would meet Guildford's needs. This is 40% less than the GBC figure.

The council, by their lack of transparency, detract from any provenance to their plan.

Gosden Hill is on Green Belt land, which should be preserved, rather than encroached, with the inexorable extension of development. This, ultimately, results in communities coming together as one large urban sprawl, with little re-oxygenating green space between…..bad for the environment, and for those who live in it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13244  Respondent: 15588929 / Alex Hutchings  Agent:  

**POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

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

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Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13293</th>
<th>Respondent: 15589665 / Anna Worsley</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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<tr>
<th>Comment ID: PSLPP16/13322</th>
<th>Respondent: 15589889 / Keith Macdonald</th>
<th>Agent:</th>
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Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

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Attached documents:

Comment ID: PSLPP16/13391  Respondent: 15590273 / Eunja Madge  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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Attached documents:

Comment ID: PSLPP16/13473  Respondent: 15590593 / Johnathan Page  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Linked documents:**

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**Comment ID:** PSLPP16/14163  **Respondent:** 15601217 / Patrick Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/14161  **Respondent:** 15601249 / Ann Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14256  Respondent: 15601953 / Stephen Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Policy doesn’t set any constraints on building.
- Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14308  Respondent: 15602177 / Julia Hunt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/14486  **Respondent:** 15603361 / Ann Watkins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL): • Policy doesn’t set any constraints on building. • Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors. • Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation. • Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16265  **Respondent:** 15603361 / Ann Watkins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

**Comment ID:** PSLPP16/14552  **Respondent:** 15603489 / Simon Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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**Comment ID:** PSLPP16/14878  **Respondent:** 15608289 / Olivia Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. The Hog’s Back is a stunning landscape which should not be damaged.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15403  Respondent: 15614497 / Hannah Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL):
• Policy doesn’t set any constraints on building.
• Housing mix based on preBrexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15487  Respondent: 15615745 / Nicholas Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area.

Please note, however, that I support policy H1 as regards travellers' sites. This strikes me as sensible and I believe that other objectors are influenced by negative prejudices about travellers as people rather than an objective and considered response to the development and planning issues involved.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/15636  **Respondent:**  15618305 / Lawrence Claridge  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/15635  **Respondent:**  15618337 / Matthew Pitt  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy H1 - Homes For All

I object to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not done so. Freeing up private housing in the town currently used for student accommodation and that housing could provide local people with affordable housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy H1: Homes for all

It is agreed that new residential development should make the most efficient use of land whilst responding to local character, context and distinctiveness. This said; some existing housing areas in the borough were developed at a time when there were not the constraints on available land that exist today and as a result are low in density. To limit the impact on the countryside and reduce future incursion into the Green Belt, developers should be encouraged to increase density where this will not impact on the character of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15818  Respondent: 15624577 / Alec Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/16235  Respondent: 15636289 / Chris Holmes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The inclusion of what I see as a wholly inappropriate number of traveller sites. The region (especially the band running from NE Guildford through Normandy to Aldershot) already has the highest density of traveller sites I have seen in any other County. Why is this so, and why are more sites being considered when there are areas within Surrey with no traveller sites?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/16330  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H1 (HOMES FOR ALL): • Policy doesn’t set any constraints on building. • Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors. • Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation. • Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/16485  Respondent: 15645537 / Francis Garguilo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Brownfield opportunities are being ignored, or assigned elsewhere – we need more homes in the town centre (not 40% more shops), and much more accommodation on campus for students, and homes for the elderly to free up family houses. The University needs to build the student accommodation it promised in 2003. The University impact needs to be allowed for and managed in this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/16728  Respondent: 15649889 / Alan Hughes  Agent:
Build smaller homes for first time buyers and/or for the elderly to free up larger family homes.

Do not rely on a system where developers build large homes to finance smaller ones. Build social housing out of Government funds now.

I object to Policy H1 for the following reasons:

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the Plan period. It fails to set rules on important issues such as constraints and density and is not specific enough to provide a practical framework for planning decisions.

A much higher proportion of Surrey University students should be housed in university accommodation. The University has proved to be recalcitrant in providing accommodation in spite of outstanding Planning permissions. The policy does not do enough to rectify this.

I object to the increased numbers of Traveller pitches proposed. See my comment #9 in Policy S2 above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed increase in the number of Travellers' pitches. The provision of additional Travellers’ pitches, often in the Green Belt, is a source of much local friction between the settled community and the “Travellers”. Especially where the Plan references limiting the occupancy of these pitches to a small number of specific families, does this not imply these will be permanent residences? Regardless of the nature of construction of their dwelling, if one family spends their entire life on one spot, can they be said to be “travelers” with a different set of rules to those of us who live in “permanently constructed” dwellings. I do not believe their lifestyle choice should be a matter for public provision of pitches, and there is no longer any requirement for journeymen in this modern economy. I am especially concerned at the
detrimental impact of the Borough’s encouragement of this lifestyle on the Traveller children and their educational needs. The open-ended wording of the numbers to be permitted (at least 73 “or any new target as identified within an updated Traveller Accommodation Assessment”) is dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16807  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17092  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1 – Homes for All

Barratt David Wilson Homes support this Policy and welcome the aims of providing a wide choice of homes and a mix of tenures, types and sizes as appropriate to the site location.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17128  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT {POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17148  Respondent: 15667937 / James Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H1 (Homes for all) provides details relating to the choice and mix of housing to help create balanced, sustainable and inclusive communities. Within Policy H1 there is a sub-section for specialist housing that states "we will support the provision of well designed specialist forms of accommodation in appropriate sustainable locations, taking into account local housing needs". However, there is no clarification on what "local housing needs" actual means in terms of geographically coverage. We believe it is reasonable to assume this is in reference to the whole of Guildford Borough, as this is the split identified in the SHMA derived from the whole HMA. However, the Policy should be explicit and confirm it is Borough wide.
On development sites of 500 homes or more it is a requirement that Traveller accommodation should be provided on site. It is considered that a similar wording for specialist housing would ensure sufficient delivery of specialist housing, including care homes, on the larger sites (c.1,500+ homes). Providing the opportunity to incorporate an appropriate housing mix, with careful design and layout, within a larger scheme; thereby creating a balanced, sustainable and inclusive community as required by Policy H1.

Under housing mix in Policy H1, the second paragraph currently states “development that results in the net loss of housing or specialist housing, including sites allocated for housing within the Local Plan will not be permitted”. This element of the policy is overly restrictive and could conflict with other policies in the Plan (for example E1 – Sustainable employment) and it is proposed that it should be removed. There would still be the opportunity to ensure proposals respect and respond to local character, density and site specific concerns through other policies and also through Part 2 of the Local Plan, which will provide detailed development control policies.

In terms of monitoring for housing delivery, the policies and monitoring are clear on C3 use; with the overall target of 13,860 contained within Policy S2. However, paragraph 4.2.7 is confusing and contradictory in terms of monitoring especially student accommodation and Use Class C2 residential institutions for older people. The Policy separates C3 use from C2 residential institutions; as these are identified separately within the SHMA. As these are split, “purpose-built student accommodation on campus and Use Class C2 residential institutions for older people are considered separately from general housing needs in this plan”, it makes sense to monitor these targets separately to ensure a suitable mix of housing is delivered over the plan period. However, paragraph 4.2.7 continues and states that “Any additional student accommodation or residential institutions built over and above projected need (as identified in the SHMA) will count towards the general housing requirement, based on the amount of accommodation it releases into the general housing market.” This appears to allow the Council to count student accommodation and C2 use, which they state (and the SHMA identifies) as separate requirements, towards their general overall C3 housing requirement.

Page 37 contains the monitoring indicators associated with Policy H1. This includes the different sizes and types of housing to ensure the appropriate mix and density of development. Older person’s specialist housing (including care homes) are listed as a separate indicator to be monitored, however there is no specific target within Policy H1 (or indeed Policy S2) to monitor against nor is one specified within the table on page 37. The Policy and monitoring appear to conflict and it is not explicitly clear if these are separate or are a combined requirement. If the Council is seeking to provide older persons’ specialist housing (including care homes) separately, then there should be a specific number for care home bedrooms identified within Policy. Currently this monitoring has no relevant policy associated with it and paragraph 4.2.7 potentially allows double counting towards the C3 requirement. It is also considered inappropriate for the Plan to simply refer the mix within the ‘latest SHMA’, as this does not provide clarity and is ineffective; especially if draft versions or addendums to the SHMA are issued and their status, in terms of the policy, is vague.

Furthermore, in relation to housing for older people, paragraph 4.2.11 identifies the changes in ageing population and the need for the housing stock to be flexible to enable people to remain in their own homes for longer. It further identifies the option for smaller homes which will enable people to downsize and remain in their local community rather than move to specific care home provision. This can be achieved through good design such as level access, door openings and layout and circulation space to enable people to continue to live independently. It is agreed that these considerations contained within paragraph 4.2.11 are valid and reflects both national policy and the evidence base contained within the Strategic Housing Market Assessment. If successful, implementation of this policy approach will reduce further the need for care home provision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Housing Policies: Policy Hl "Homes for all" suffers from the inclusion of an unacceptable requirement to impose on the University (regardless of Blackwell Farm) an obligation to provide accommodation for 60% of its students on campus. This imposition will limit education and will create a "them and us" style society. The housing problem in Guildford is not caused by students or the University and the Town should not discriminate against them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17546  Respondent: 15688193 / Sally Tagg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Proposed Submission Local Plan– Regulation 19 Consultation

This letter includes the formal comments to Guildford Borough Council’s Proposed Submission Local Plan from Foxley Tagg Planning Ltd. – a national planning consultancy that specialises in custom and self-build.

This response document will explore the proposed submission document’s consideration of custom and self-build matters.

This representation will consider the Proposed Submission Local Plan in the context of the Tests of Soundness, against which the plan will be considered at examination. These tests are:

1. **Positively Prepared**: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements
2. **Justified**: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

   1. **Effective**: deliverable over its period based on effective joint working on cross-boundary strategic priorities
   2. **Consistent with national policy**: enabling the delivery of sustainable development

**Policy Requirements**

Paragraph 50 of the National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPA) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state (underlining is our emphasis):

“Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)”

In addition to the above, paragraph 159 of the NPPF considers the requirement for LPA’s to have a clear understanding of housing needs in their area. They should therefore ensure that their policy documents:

“Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)”

Brandon Lewis MP, in his role as Minister of State for Housing and Planning made the following comments in a letter sent to all Local Planning Authorities in March 2015:
“We all need to do more to address the lack of suitable plots of land being made available, and we believe that local planning authorities have a vital role to play.”

The letter went on to say:

“National planning policy and guidance is clear that local planning authorities should identify and plan for local demand for custom and self build housing. Planning inspectors will want to see evidence that consideration of demand for custom and self-build housing has been taken into account when they examine Local Plans. Failure to provide sufficient evidence may lead to plans being found unsound.”

This communiqué from the Department of Communities and Local Government could not be any more explicit in its requirements for LPAs to plan for the needs of those that wish to build their own home.

The Self-build and Custom Housebuilding Bill received Royal Assent on 26 March. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. It is understood that Guildford Borough Council have complied with the legislation and keep a register of those in the borough that wish to build their own home.

The above comments from the Planning Minister and the emerging Right to Build legislation clearly demonstrate how the government intended LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination.

Critique of Evidence Base

The evidence for housing needs within the emerging Local Plan evidence base is centred on the West Surrey Strategic Housing Market Assessment (SHMA) September 2015.

The paper does make reference to custom and self-build and notes that the Government aspires to make self-build ‘a mainstream housing option’ and makes some attempt to quantify the demands for self-build in West Surrey. The paper states that the 2012 Guildford BC Housing Needs Survey revealed a very low interest in self-build in the borough. However, contact with custom and self-build specialist website Buildstore revealed a much higher indicative demand:

‘Within the postcodes of Guildford, there are 65 people registered their details on the Custom Build register and 216 active members on the Plotsearch register’

The SHMA also reveals that Buildstore register of plots shows a supply as of June 2015 of nine self-build sites within West Surrey with six plots for sale in Guildford borough.

It is considered that the council have not really tried to understand the demand for custom- and self-build in the borough. The SHMA simply concludes that there is ‘modest’ demand in the SHMA area with ‘limited’ supply. As a consequence, it is considered that the plan cannot be said to be positively prepared or justified as there has been no concerted attempt to establish the actual demand for custom or self-build within the borough beyond the data held by a single website. This is clearly at odds with the March 2015 letter from Brandon Lewis MP.

Critique of Pre-Submission Plan

There are no policies within the Proposed Guildford Borough Local Plan that deal directly with custom and/or self-build. The reasoned justification (paragraph 4.2.12) explains that the council have a legal responsibility to keep a register of individuals or interested associations that are seeking a plot of land to construct a self-build or custom build house. It further goes on to explain that Guildford BC will have regard to the information on the register when carrying out planning functions and explains that the council ‘have allocated some self-build plots within the strategic housing development sites’. Lastly it states that the council will keep further demand under review.
Whilst the above all sounds promising and would appear to be broadly in line with the requirements in the NPPF, the Right to Build and government missives, a closer look at the allocations made by GBC reveals that the council have not in fact stipulated a number of self-build plots to be allocated nor have they produced a target for the number of self-build plots that should be built in the borough over the plan period.

There are 5 allocated sites on which some provision for self-build is made. However, as can be seen below all five allocations include 'some self-build plots' as 'opportunities', with no specified figures attached:

**POLICY A22: Land north of Keens Lane, Guildford**

Opportunities:

- Inclusion of some self-build plots as part of the provision of new homes (C3)

**POLICY A25: Gosden Hill Farm, Merrow Lane, Guildford**

Allocation:

- Approximately 2000 homes (C3), including some specialist housing and self-build plots

**POLICY A26: Blackwell Farm, Hogs Back, Guildford**

Allocation:

- Approximately 1800 homes (C3), including some specialist and self-build plots

**POLICY A35: Land at former Wisley airfield, Ockham**

Allocation:

- Approximately 2000 homes (C3), including some specialist housing and self-build plots

**POLICY A46: Land to the south of Normandy and north of Flexford**

Allocation:

- Approximately 1,100 homes (C3), including some specialist housing and self-build plots (C3)

The above therefore does not guaranteed that any self-build properties will be provided in the borough over the plan period. Indeed, it would appear peculiar in fact that the council would go to the lengths of mentioning self-build within the strategic allocations but not specify how many self-build units should be built, either on each site or even overall.

It is considered therefore that Guildford Borough Council have not in fact identified and planned for local demand for custom and self-build housing. It is a tokenistic approach, which although a step in the right direction, does not go far enough in our view. The council are simply aware that demand is ‘moderate’ and have suggested that there are ‘opportunities’ for self-build on some of the Local Plan’s allocated sites. This is clearly not sufficient to fulfil the government’s requirement that ‘local planning authorities should identify and plan for local demand for custom and self build housing’. As a consequence, it is considered that the plan cannot be said to be positivity prepared as the council cannot demonstrate that needs of the community are necessarily going to be met, specifically those that wish to build their own home.

Furthermore, the plan cannot be said to be consistent with national policy since the NPPF states that councils ‘should look to plan for a mix of housing based on present and future demographics, market trends and the needs of different groups in the community including … people who wish to build their own homes’. Whilst the Local Plan mentions self-build opportunities in relation to the strategic allocations, there is no guarantee that the numbers that will be delivered will be sufficient to meet the demand in the area.
It is considered that the best way of ensuring delivery of self-build opportunities in the borough is not by alluding to an unspecified potential number of self-build opportunities on an allocated strategic housing site. Rather the council should consider the opportunity for more than one approach which should include the allocation of dedicated self-build sites, giving choice and an opportunity for smaller land owners to come forward with sites. Large developers are considered likely to resist the provision of self-build plots on the strategic allocations preferring to build their own product. Furthermore, since the Local Plan does not state a minimum number of self-build plots that should be provided it is difficult to see how the council will ensure that sufficient are provided. As a consequence, it is considered likely that the provision of self-build opportunities will be unlikely to meet the demand in the borough.

Conclusions

1. The council’s attempts to assess the demand for self-build are inadequate. The plan has therefore failed the test of soundness in terms of being justified and consistent with national policy.

Custom- and self-build demand within the borough must be properly assessed.

1. The ‘opportunities’ for self-build included on the strategic allocations within the plan are wholly inadequate as a means of meeting the demand for self-build in the borough. The plan has therefore failed the test of soundness in terms of being positively prepared and consistent with national policy.

Dedicated self-build housing sites should be allocated within the Local Plan to ensure that the demands of those that wish to build their own home are met.

The Local Plan in its current form clearly cannot be considered sound and the above observations and suggestions are proposed to help to ensure that the plan is robust when submitted for examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17595  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17674  **Respondent:** 15693153 / Zurich Assurance Ltd **Agent:** Barton Willmore LLP (Sinéad Morrissey)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Paragraph 4.2.1 that precedes Policy H1 seeks to ensure GBC meets the housing needs of its Borough, accommodating families, older people, people with disabilities, travellers and students.

**Housing Mix**

With regard to housing mix Policy H1 requires development to “…deliver a wide choice of homes and meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment”. The extract from GBC’s SHMA reproduced in Figure 4 below highlights the preferred housing mix appropriate to the housing needs in Guildford Borough.

Applying the 40% affordable housing target set out in Policy H2, discussed in more detail below, Zurich notes that the arithmetic in the above table is incorrect. Zurich therefore recommends GBC reviews the content of the SHMA and clarifies the policy requirement going forward. Table 2 offer an alternative approach assuming the proportion between market and affordable housing and associated dwelling mix remains unchanged.

Notwithstanding the above, Zurich supports the recognition contained in Policy H1 that “new development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location”. Zurich is committed through their future proposals for Broadford Business Park to delivering a full mix of new homes. The precise mix will be agreed in liaison with GBC Officers and taking account of market condition at the time the Site is brought forward for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BBP-1 Reg 19 Reps.pdf (1.6 MB)

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Comment ID: PSLPP16/17843  **Respondent:** 15704737 / Sarah Smith **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
The University should be made to house almost 100% of its students. The housing market in Guildford is ruined by the huge number of student homes, which are always badly kept and a mess. House them all on campus land and free up the other housing for those non-students who need them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17904  Respondent: 15705825 / Alan Sutherland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Living in Guildford as a student has never been easy. For the last fifty years the continued expansion of the town through industry, retail and business has put pressure on the student community which has been traditionally pushed to the fringes of Guildford. Recently however, the phenomenon of a middle class exodus from the city into the suburbs has put unbearable pressure on the student community. All residents of the town on low income now have to compete for an ever dwindling stock of rental properties. Combined with the arrival of the amateur landlord, students are regularly ripped off with sub-standard properties and face a fight to safeguard their deposits.

As a result of this change the student community has been scattered far and wide

International students are particularly hard hit by the lack of affordable student rentals as they lack the local knowledge and have to arrange their accommodation remotely, this leaves them prone to extortion by landlords and agents, or even faced with arriving in the UK to a house that does not actually exist despite apparently having paid for one online.

Rental Values

Almost every student who responded told us the rent they ended up paying was either the same or more expensive than they had budgeted for. The average budget overspend was £47 per month, which compounds the financial difficulties faced by our students.

The average rent paid excluding bills was £457 per calendar month. This gives Guildford landlords an estimated monthly income of £2.2m. Despite this, students are regularly told they must ‘do more’ to be a part of the community even though the entirety of their student maintenance loan pays for accommodation alone.

In academic year 2014/15, University of Surrey students borrowed £21m for living costs, and the total outstanding debt for all current students and alumni is over £318m. As we have shown with the exception of the tuition fee loan, the maintenance loan is paid wholesale to Guildford landlords. Surrey students will be paying this debt for the next forty years or more.

Transport

As the University has committed to reducing car journeys, Surrey students have to rely on the local bus or train service. The Arriva bus service is rated poor or worse in every category that was measured

The lowest rating was reserved for ‘punctuality’ which is no doubt a result of the poor provision of traffic control in Guildford, as the town is gridlocked at peak times.

For those students who do rely on a car such as student nurses and midwives, they face frequent berating from non-student residents who believe they have a greater right to park their car in the estate than ‘a student’.

Conclusion
While it is true that many students are transient in nature, this is often not by choice. Many graduates would naturally remain in Guildford as that is where the developing industries of the 21st century are based, many of whom have benefited from the University influence.

Guildford borough development has been woefully inadequate for the last two decades and simply not kept pace with the demands of this region. As a result, Guildford is regressing to a quasi-feudal system where those who were fortunate enough to capitalise on the housing boom of the 1980’s and 1990’s hold sway over the student class who must now work almost full time to support the high cost of renting.

A privileged class of landowner holds Guildford in its grip, believing that only they have the right to a secure home, to a reliable income, and to afford the space for their car (or multiple cars). The very nature of Guildford is being sterilised as it gradually transforms into ‘Fortress Surrey’ with the drawbridge pulled up.

The students of the University of Surrey have been a part of Guildford for fifty years, they have contributed financially, culturally, physically and emotionally in the history of this town. This is the time that Guildford must now repay this faith and loyalty.

More housing is needed urgently.

Reliable transport is needed urgently.

The local plan must be implemented in full, as is drafted, as soon as possible.

<full document attached>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID: pslp171/1607  
Respondent: 15717217 / Ian Ferguson  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In View of flawed new evidence, Guildford’s proposal for more than 12426 homes (plus buffer of 1,155 homes) is excessive and will result in needless loss of green belt and green character, and increase congestion, that cannot be justified in our heavily constrained borough. Their is evidence Guildford’s population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID: PSLPP16/18435  
Respondent: 15724353 / Arvnid Parmar  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18515  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

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parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**POLICY H1: HOMES FOR ALL; PAGE 31**

Mix

It is important that there is sufficient flexibility in this policy to ensure that housing mix/tenure genuinely does take account of the “size, characteristics of the site and location” to ensure that Development sites remain commercially attractive.

Paragraph 4.2.3 is considered to represent a realistic summary position and the Council should support schemes which broadly follow these principles. The Council should not, however, seek to unduly influence the proposed mix.

Housing for Older People

Supporting text at paragraphs 4.2.9 -4.2.11 recognise the need for; specialist homes for older people as well as residential car and nursing homes. However, this issue needs to be set out more clearly within the policy itself or indeed a standalone policy. Site Allocations and supporting policies also need to take specific account of the needs and requirements of older housing.

The NPPF states at paragraphs 50 and 159 the need to deliver a wide choice of homes to meet the needs of current and future demographic trends and meeting the needs of different groups of the community including older people. The PPG further reinforces this, stating under the heading of ‘Housing and Economic Development Needs Assessments’ that:

“The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households

(Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector.”

One of the ‘online tools’ referred to is the Strategic Housing for Older People Analysis Tool (SHOP), provided through the Housing LIN website, which provides a basic tool for forecasting future demand for specialist housing accommodation based either on traditional growth expectations or growth based on increasing life expectancy. This data would indicate the need for extra care accommodation and care beds as follows:
<table>
<thead>
<tr>
<th>Year</th>
<th>Extra Care</th>
<th>Care Home (Nursing)</th>
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</thead>
<tbody>
<tr>
<td>2014 – 2015</td>
<td>278</td>
<td>500</td>
</tr>
<tr>
<td>2015 – 2019</td>
<td>285</td>
<td>513</td>
</tr>
<tr>
<td>2020 – 2025</td>
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<td>743</td>
</tr>
<tr>
<td>2035 – 2040</td>
<td>453</td>
<td>815</td>
</tr>
</tbody>
</table>

With reference to current provision, the SHOP data shows that at present there are only 164 extra care units provided within the District, and 548 nursing care beds. Assuming that this position remains unaltered the future need for extra care will continue to result in an under supply, whilst for nursing care following 2020 there will also be a deficit.

In the above context, the SHMA (2015) highlights that over the plan period there is a projected increase of 43.5% in the population of residents over 65. As the population is ageing the need to provide housing to meet the varied and complex needs of older people will become a key driver of change in the housing market.

The future population growth of older people must be planned for in order to ensure the provision of sufficient specialist housing to meet identified needs, accordingly we consider that specific sites and/or locations should be included within the Plan. The identification of specific sites can be included as part of the overall housing requirements for the District, even when they fall within a Class C2 definition, as noted in the NPPG as follows:

“Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan.” Paragraph: 037 Reference ID: 3-037-20150320.

A failure to proactively plan for the future housing needs of all groups within the community will result in a greater imbalance in the supply of specialist housing compared to traditional market housing. As well as a demonstrable need for this specialist form of housing, the delivery of this accommodation enables residents to make a conscious decision to ‘rightsize’, choosing a property that suits their care and support needs while removing the potential burden of the upkeep of their existing property. In addition, the delivery of such a scheme provides the opportunity to free up larger under occupied family housing within the local area. These are all added benefits of providing such a development.

Policy H1 needs to provide clearer guidance and support for the provision of housing for older people. It should be recognised that:

- Specific provision should be made for older housing in settlements across the Borough;
- Older person’s accommodation can be delivered at a higher density than family housing and this should be reflected in site density calculations.
• Recognition of the role of supported sheltered housing, enhanced and extra care and care communities and villages.

The provision of accommodation for the frail and elderly is loosely wrapped up as part of a recognised need for ‘Specialist Housing’ including housing for; homeless people, people with health issues. This policy approach is, however, considered to be far too broad and does not reflect the growing trend for flexible residential communities for older people which can meet their transitioning needs over time without requiring them to move home or from a wider community/village.

The policy should be amended or a separate policy created to reflect this nuance and to make appropriate provision covering the broad spectrum of needs for older housing.

The Council must allow flexibility to allow for some of the allocated sites to include accommodation for specialist uses. Site A28 should be allocated for C3 and/or C2 uses.

This should be seen to contribute to housing targets, however, where provision is made for care accommodation it should not be burdened by the restrictions of providing affordable housing or the same level of CIL charges as standard market housing. Such accommodation needs to be set as a self-contained community and will typically involve reduced car movements, education constraints and provide more facilities and services on site.

Self-build and custom housebuilding

The Council make only a limited reference to self-build and custom housebuilding at paragraph 4.2.12 where-as this should form part of the specific policy wording.

The text and policy wording should also be positively phrased to encourage the development of self-build housing on both identified and windfall sites. Whilst the Council note that some self-build plots have been allocated within the strategic housing development sites it is considered more likely, that demand for self-build schemes will come forward on smaller scale sites. Accordingly, the Council should ensure that self-build proposals will be supported wherever they are proposed.

Furthermore, the self-build register should provide a guide on where the Council should make appropriate provision for plots, however, this should not be referenced or used to prevent sites coming forward. A flexible approach to self-build development will be key in supporting and encouraging self-build as a productive source of housing supply.

Density

To ensure that the most productive use is made of any site released for development it is recommended that the Council set a minimum baseline density per hectare. It is suggested either a blanket minimum density of 30 dph or potentially a sliding scale between greenfield and brownfield sites.

Our Client supports the identification of site A28 for the development of 62 homes, based on the LAA assessment work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Mix

It is important that there is sufficient flexibility in this policy to ensure that housing mix/tenure genuinely does take account of the “size, characteristics of the site and location” to ensure that Development sites remain commercially attractive.

Paragraph 4.2.3 is considered to represent a realistic summary position and the Council should support schemes which broadly follow these principles. The Council should not, however, seek to unduly influence the proposed mix.

Density

To ensure that the most productive use is made of any site released for development it is recommended that the Council set a minimum baseline density per hectare. It is suggested that the policy adopts a blanket minimum density of 30 dph.

In line with this approach the capacity for Site Allocation A45 should be increased to circa 30 units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY H1: HOMES FOR ALL; PAGE 31

1.48 The proposal to delete the reference to Density in this policy is considered UNSOUND as it will undermine the effective delivery of sites. The reference to Density should be reinstated and the policy wording expanded to set a minimum baseline density per hectare. It is suggested that the policy adopts a blanket minimum density of 30 dph.

1.49 This will ensure that the most productive use is made of any site released for development.

1.50 In line with this approach the capacity for Site Allocation A45 should be increased to circa 30 units.

1.51 The proposed limited reference to Density in Policy D4 does not address these concerns.

SOUNDNESS: To ensure the EFFECTIVE delivery of sites the Council should ensure that Density figures for allocated sites make full use of site potential and should be based on robust analysis.

UNSOUND: The Policy wording should be adapted to include reference to a minimum baseline density per hectare. To reflect the current housing shortfall it is suggested that this is set as a minimum 30 dph.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1240</th>
<th>Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
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<td>Document:</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.
We object to the change by way of deletion of the paragraph on density:
“New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.” This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

We support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London. We object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based on the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.” The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

We object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints. We object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need. We object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential.

Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.” To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17156  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Stuart Mills)
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We support the policy’s aspiration for new residential development to deliver a wide choice of homes that can meet a range of accommodation needs as set out within the latest Strategic Housing Market Assessment. We note that development on specific sites should provide a mix of tenures, types and sizes appropriate to the site size, characteristics and location, and welcome the fact that the policy recognises the need to have regard to site-specific context rather than requiring a uniform mix across all development sites in the Borough. We similarly support this site-specific approach to density considerations.

With regard to the provision of Traveller accommodation, whilst we welcome the fact that the Local Plan is seeking to meet the identified need in accordance with the requirements of the national Planning Policy for Traveller Sites. We wish to raise concerns however regarding the requirement within Policy H1 for developments of 500 homes or more to include provision for Traveller accommodation - developments of 500 to 999 homes being required to provide two pitches. We query whether this requirement is based on any particular evidence regarding the desire for those in Traveller accommodation to live on a small site of two pitches alongside the settled community, and whether any consideration has been given to how these pitches would be successfully integrated into the development whilst also meeting the requirements of the Traveller community. In the absence of this evidence, it is unclear how the requirements would effectively meet the needs of Travellers.

Proposed Amendments
Consequently, in order to ensure this part of the policy is sound, in our opinion it is necessary to either remove the requirement for the provision of Traveller pitches as part of large scale residential development in its entirety in the absence of any evidence to support this strategy, or the wording of the policy should be amended to read:

“Traveller accommodation should be provided on suitable development sites of 500 homes or more whilst there remains an identified need…”

Any such update to the wording of Policy H1 would also need to be reflected in paragraph 4.2.24 of the supporting text, which we suggest should also either be removed or updated to read:

“We require traveller accommodation within suitable development sites of 500 homes or more to help create sustainable, mixed communities with suitable housing for all.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Showpeople do not appear to be consistent with the latest site allocations. To ensure a sound policy basis upon which traveller accommodation is allocated in the Local Plan, the Council should consistently ensure that in accordance with Policy H1 only sites capable of delivering 500 or more dwellings should be required to provide Gypsy & Traveller pitches/Travelling Showpeople plots.

3.20 The provision of Gypsy & Traveller/Travelling Showpeople accommodation specifically relating to the Land at Garlick’s Arch is discussed further in our comments on the proposed amendments to Policy A43.

Self-Build and Custom Housebuilding

3.21 Whilst the requirement to provide self-build and custom build housing as a percentage of development proposals would appear to be broadly reasonable in principle, it is unclear at this stage what the actual need for self-build and custom build is in Guildford. The 2015 West Surrey SHMA noted that there was modest interest for custom and self-build properties in the Housing Market Area, but did not draw specific conclusions regarding the need for self-build and custom build units in each Local Authority area. The 2017 Addendum did not provide any further assessment of need and thus it is unclear to what extent the proposed 5% requirement set out within Policy H1 will serve to meet Guildford’s housing needs in this regard. We therefore encourage the Council to clarify the need for self-build and custom build units over the plan period and how the 5% requirement relates to this need.

3.22 It is also unclear within the supporting text to the policy at paragraph 4.2.27c what a “significant proportion” would comprise, when it states that a significant proportion of dwellings within the first phase of a development should be self-build or custom build. We therefore encourage the Council to clarify what would be regarded as a “significant proportion” in order to ensure the policy and its supporting text provides a clear indication of how a decision maker should react to a development proposal, in accordance with paragraph 154 of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18665  **Respondent:** 16058113 / Ockham Parish Council (Ockham Parish Council Alyson Blackwell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. The Local Plan offers too much land for development, based on a flawed Strategic Housing Market Assessment, and an artificially inflated Housing Target not justified by actual or reasonably projected demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/18667  **Respondent:** 16058113 / Ockham Parish Council (Ockham Parish Council Alyson Blackwell)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Against this background, OPC **OBJECTS** to the Local Plan overall on the following grounds:

1. The Local Plan proposes major, unjustified and unacceptable erosion of, and removal of villages or major parts thereof from, the Green Belt.
2. Over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.
3. The housing number of 693 houses per year from the Strategic Market Housing Assessment is based on flawed analysis, is far too high and is challenged by neutral experts in the field. The direct and indirect impacts of Brexit are likely further to reduce housing demand in London, the Southeast and not least Surrey.
4. New houses, schools and services should be developed in or adjacent to areas of actual demand and not in relatively remote areas which inevitably and unnecessarily result in major increases in travel requirements from home to work, work to home, home to school, etc.
5. The proposed allocation of housing in the north east of the Borough particularly Ockham, Ripley, Send and the Horsleys is a prime example of locating supply impractically far from the areas of demand, and is totally disproportionate to allocations elsewhere in the Borough.
6. The continued inclusion in the Local Plan of the former Wisley airfield (which is located in Ockham and which is known locally as Three Farms Meadows) is perverse and illogical, and is unsound for reasons of sustainability, deliverability and need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1505  **Respondent:** 16206593 / Bloor Homes (Rebecca Fenn-Tripp)  **Agent:** Turley (Donna Palmer)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
### Accessible Homes

2.23 The revised policy wording seeks to include the following requirement:

> “On residential development sites of 25 homes or more 10% of new homes will be required to meet Building Regulations M4 (2) category 2 standard ‘accessible and adaptable dwellings’ and 5% of new homes will be required to meet Building Regulations M4 (3)(b) category 3 wheelchair user accessible dwellings standard or any subsequent legislation on making homes accessible and adaptable.”

2.24 The NPPG makes clear that it is for LPAs to demonstrate the need for these requirements. It is considered that insufficient evidence has been provided by the Council to justify these requirements. The only justification provided by the Council relates to generic comments from the SHMA and Addendum SHMA regarding the ageing population in the Borough. Based on the currently available evidence it is considered the requirement is unsound.

2.25 Furthermore, whilst the supporting text at paragraph 4.2.10 indicates that there will be a degree of flexibility as to how the requirements are applied, this is not reflected in the policy wording. Whilst the principle of the flexibility is supported, concern is also raised regarding the proposed wording which currently states that the requirement will only be relaxed “where substantial evidence is provided to justify an exception.” Clearly this requirement is inappropriate and is not the correct test to be applied. Flexibility should be allowed where proportionate evidence is provided which clearly justifies an exception. This justification could relate to viability grounds as well as whether a need for the provision to be made on the site can be identified or not.

### Self-build and custom housebuilding

2.26 The Policy seeks to require the provision of plots for self-build and custom housebuilding by introducing the following requirement:

> “Self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character. On development sites of 100 homes or more 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. For phased development, self-build plots must be delivered and serviced at the earliest stage possible. Self-build and custom housebuilding plots are encouraged on smaller residential development sites.”

2.27 As currently drafted it is unclear whether the requirement to have no adverse effect on the local character relates to the self/custom build element itself or the wider proposals. In any event it is considered that this wording is inappropriate as it seeks to apply a definitive test which does not allow for application of the planning balance. Whilst proposals should seek to have no adverse effect on the local character any harm should be weighed against the benefits of the proposals. Furthermore given the nature of self/custom build, the potential effects on the local character will not be able to be assessed definitively at the point of determination of an application for the wider development site. As currently drafted, concern is raised that the necessary lack of certainty of the effects of these plots may prevent the approval of applications for the wider site if this policy wording is to be rigidly applied.

2.28 The PPG makes clear that the Local Planning Authority must assess the local demand for self-build housing. The PPG advises:

> “Plan makers should, therefore, consider surveying local residents, possibly as part of any wider surveys, to assess local housing need for this type of housing, and compile a local list or register of people who want to build their own homes” (ID 2a-020-20140306).

2.29 Whilst the Council’s website provides details of how to apply to be on the register, including details of a recent consultation on revised eligibility criteria, there are no details as to the number of people currently on this register. As such it considered that there is insufficient information to justify the requirement currently proposed.
2.30 Furthermore, whilst we agree that custom and self-build may be appropriate for some schemes, we do not consider that large strategic sites are an appropriate location and are unlikely to be taken up. The policy wording does specify that plots are only required to be made available and marketed for a period of 18 months, before, we assume as this is not explicitly stated in the policy wording, reverting to the developer. It is however considered that this will delay the delivery of the scheme, create uncertainties in the build programme for developers and potentially add additional costs as a result of abortive work.

2.31 Whether or not the percentage requirement of custom/self-build housing is amended, should the Council be minded to retain a requirement for all housing developments of 100 or more dwellings, we consider that the words “subject to viability” should be added to the policy to provide suitable flexibility. It is considered that the requirement for delivery of self and custom build plots at an early stage will add to the potential viability implications given the early delivery of units is generally required in order to fund necessary supporting infrastructure works. Furthermore, as raised above, if these plots do then revert to the developer due to lack of interest, this would likely lead to additional costs due to changes to the build programme etc.

2.32 It is noted that the supporting text to the policy states that:

“Higher density residential sites for flatted developments are unsuitable for self-build and custom housebuilding plots; they are therefore exempt from the requirement to provide plots.”

2.33 The wording of the supporting text is not reflected in the Policy wording itself as currently drafted. Furthermore there is no clarity on the Council’s definition of higher density and how this would be applied to developments which contain a mix of houses and flats.

2.34 As currently drafted this requirement is considered to be unsound in that it is not justified, effective or consistent with national policy.

Policy H1 – Insufficient evidence has been provided to justify the Council’s proposed requirement in respect of accessible homes.

Concern is raised as to whether the requirements for self-build and custom housebuilding are justified and effective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object that the north east corner of the borough is being proposed for these large developments. The plan is unbalanced. 36% of the development is proposed in Wisley/Ripley/Send (A43) and Clandon (A25). At present these villages make up only 11% existing housing. I object to the new figure of 693 houses required per annum. The council has not published the SHMA report so these figures cannot be verified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
First, the New Plan would appear to be based upon flawed evidence and assumptions in respect of likely population growth over the life of the Plan. This overestimate of as much as 40%, consequent upon the inclusion of transitory students who leave at the end of their studies, results in a totally unrealistic and excessive figure for housing provision (that is not to say that there should not be appropriate student accommodation in and around the University campus). If the proposal for more than 12,500 homes is adopted (plus the buffer of a further 1,000 plus houses) the consequent developments will result in needless loss of the Green Belt, huge stress upon resources, including water & sewage treatment and a profound and utterly unacceptable increase in traffic volumes and resultant congestion.

I therefore object to the 2017 New Local Plan on the basis that it proposes excessive and totally unnecessary housing numbers for Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/269  Respondent: 17247169 / Ben Greaves  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the hiding of development by "deferment" (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by "deferring" it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housing actually being built (A24, A25, A26 - total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 - 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/302  Respondent: 17249601 / Penelope Moore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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i) to hide the number of housing actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/308  Respondent: 17251585 / Paul Reynolds  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housing actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation, is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) but does not go far enough in reducing the still very large number of new dwellings proposed on Green Belt.

1. The eastern side of the Borough is now scheduled to take an even greater proportion of new homes in the Green Belt
2. It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford

1. Nothing has been put forward since last year’s Consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements. Every home on the West Horsley sites will need a minimum of one car to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel.
2. Flawed evidence continues to be relied upon to justify overexpansion.
3. Guildford town centre needs more apartment homes NOT more shopping space. Online retailing is driving major change in ways of shopping – many reports published stating this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/320  Respondent: 17256577 / Tina Makin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
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  ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/327  Respondent: 17266785 / Ryan Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Since Brexit, forecasts of increasing population numbers have been reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/336  **Respondent:** 17267393 / Steve Knight  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I support the amendments but feel that there should be a higher density of housing in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/350  **Respondent:** 17267745 / Maureen Knight  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I support the amendments but feel that there should be a higher density of housing in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/400  **Respondent:** 17276641 / David Raison  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

There is evidence Guildford’s population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.
Even taking account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the plan period.

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/423  Respondent: 17279713 / Dawn Catchpole  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.2.10 It is essential to have more accessible accommodation for wheelchair users and to also bear in mind that not all users are elderly. There are users across the ages and younger people, i.e. 20s would not want to be in an area of people in their 70s. I am 58 and would not want to be in an area of all elderly people or young people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/428  Respondent: 17279809 / Raymond Whiteley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

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The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/603  
Respondent: 17293121 / Glyn Nicholson-Ross  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

You have established a need over the entire Borough for eight plots or pitches for Travelling Showpeople to include storage facilities along with housing. Again, this not appropriate use of Green Belt land and furthermore why is 75% of this need included in your plans for Ripley? I object strongly to this unfair allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/742  
Respondent: 17303553 / Anita Fitchie  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

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

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

I strongly object to the evidence behind the projections used to assess housing need. The question concerning the evidence underpinning the Proposed Submission Local Plan provided by The Strategic Housing Market Assessment, should not be – ‘is it adequate, up to date and relevant’, but simply - is it a valid method of analysis? It is clear from the conclusions of the NMSS report (commissioned by GRA, EGRA) that the ‘objectively assessed housing need’
Calculation is deeply flawed and invalid. Since this flawed analysis significantly overestimates the yearly housing need figure, the current housing market assessment must be adjusted in the light of this finding.

I fully support the conclusions and suggestions made by GRA in their report, particularly those concerning provision of housing for students. Students have very different, specific housing requirements from the general population which should be catered for by specialist providers, primarily the University of Surrey itself. Leaving the greater part of this provision to the open market causes considerable problems, as evidenced by issues in Oxford, which resulted in the need for licensing of all HMO rental properties across the city, just to ensure basic quality and safety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/864  Respondent: 17308705 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Steve Molnar)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Policy H1: Homes for all

The University considers that the changes to the student accommodation text of Policy H1 make some limited progress to meeting the University's previous comments and these changes are supported, namely:

• the reference to full time Guildford based students
• the first sentence of the policy is now expressed in a positive tone and is neutral on institutions.

However the changed policy wording regarding 'About 60%....expected to be provided with accommodation’ is still not sound, and the University’s previously expressed concerns remain. These are fully articulated in the original submission so are not repeated here.

The University therefore supports the first sentence of the policy text, reading “Purpose built student accommodation for full time higher education Guildford based students will be encouraged on campus locations where appropriate”.

The University suggests that the following policy text should be deleted from the policy:

“We expect About 60 per cent of full time Guildford based University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces and accommodation on campus.”

The text to be deleted is not necessary in the policy. The policy should not give the impression that there is an obligation, requirement or expectation on the University to provide a particular level of accommodation on campus. The University does, and will, provide accommodation on campus according to the availability of land on its estate and the ability to finance such development. Local plan policy should enable it to do so without implying a specific level to be achieved.

Para 4.2.18

The University notes that the changes to the first 2 sentences of this paragraph are broadly in line with comments we have previously made regarding full time Guildford based students and using sites in sustainable locations close to higher education establishments.

However, the University objects to the changed text that states: “however, we will resist purpose built student accommodation on sites allocated for C2 or C3 use class housing.”
This is because the provision of student accommodation on sustainable sites close to the University will help to reduce pressure on general market housing in Guildford. If allocated sites have not already come forward for the C2 or C3 use described in the allocation, then it would be appropriate for them to be used for student accommodation if a developer were to propose that use.

That part of the text in para 4.2.18 should therefore be deleted as it is unduly restrictive.

The change in the third sentence from ‘required’ to ‘expected’ is supported. The University already provides a significant amount of accommodation for its students on its estate, and it intends to build more to provide ‘a proportion’ of student accommodation on campus, as stated in the sentence.

The change to the fourth sentence makes it clear there is provision in the housing target for full time Guildford based students living in market housing. This change is supported as it acknowledges this important part of the overall student accommodation picture.

Para 4.2.19

The deletion of the text from this paragraph is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See text above.

Attached documents:
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1023  
Respondent: 17325537 / Teresa Hogan  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I recognise the urgency of a local plan for Guildford, however, I have concerns that the revised Draft Local Plan is unsound and unsustainable.

The proposal that only 60% of full time University students will accommodated on campus puts increased pressure on houses in the town. This should be closer to 80%, and thereby free up housing in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1071  
Respondent: 17328705 / Aviva Investors (Helen Rainsford)  
Agent: Q+A Planning Ltd (Peter Keenan)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Q+A Planning Ltd act on behalf Aviva Investors in respect of White Lion Walk shopping centre in Guildford town centre.

A change is proposed that deletes the section of this policy on density, and we object to the proposed deletion of the policy presumption that ‘high density development will be supported in Guildford town centre’. It is assumed that this section of the policy was removed due to the expanded detail in Policy D4 (which we comment on separately), but the clear policy direction has not been replicated in Policy D4.

In our view, including a presumption supporting high density residential development in town centres is entirely logical, since it enables the best use of previously developed land and helps cement sustainable development, with the convenient access to transport, shops and services development within the town centre will bring. Deleting this element waters down the policy for residential development.

In our view, this omission avoids the requirement for local authorities in paragraph 47 to ‘set out their own approach to housing density to reflect local circumstances’. A starting point for high density residential development in Guildford town centre would reflect local circumstances as a large town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The support for high density residential development in Guildford town centre should be reintroduced.

Attached documents:
Comment ID: pslp171/1146  Respondent: 17340033 / Guildford Private Renters Association (Nicholas Bragger)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

‘Policy H2: Affordable Homes’ - should change back to mandating social housing. Point 4 of it should be removed,
affordable housing should be included in the main site, as it creates a better society when social housing is not separated
from other developments.

Affordable housing definition in the appendix - includes social housing but makes no distinction of percentages. 40%
affordable housing is mandated and at least 20% of it should be social housing. 10% should be dedicated to being
Community Land Trust housing and/or certain smaller developments should be handed to a local group to create a
Community Land Trust. We feel that there are not enough truly affordable housing options being considered, and
Community Land Trusts, amongst other options, should be mandated. In addition social housing should be clearly
defined as ‘secure tenancies’.

Overall, we find the definition of affordable housing very vague, and makes it too easy for developers to make excuses
for not providing affordable housing. In addition, truly affordable housing possibilities (such as Community Land Trusts)
are not considered or mentioned, which is currently a disappointing missed opportunity.

Attached documents:

Comment ID: pslp171/1147  Respondent: 17340033 / Guildford Private Renters Association (Nicholas Bragger)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

H1 Homes for all: - For student accommodation we support purpose-built accommodation. The key thing is that student
accommodation needs to be expanded beyond the University of Surrey to include other academic institutions such as
Merrist Wood College, ACM, Drama School and the University of Law. We need to keep it fixed at 60% provided
accommodation, whereas currently it sounds vague.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Merrist Wood College, ACM, Drama School and the University of Law. We need to keep it fixed at 60% provided
accommodation, whereas currently it sounds vague.

Attached documents:

Comment ID: pslp171/3272  Respondent: 17345441 / Thakeham Homes (Sarah Sutcliffe)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally
Compliant? ( )
Policy H1 stipulates a requirement for residential development sites of 25 units or more to deliver 10% of new homes meeting Building Regulations M4 (2) Category 2 standard ‘accessible and adaptable dwellings’ and 5% of new homes meeting Building Regulations M4 (3)(b) category 3 wheelchair user accessible dwellings standard.

We wish to object to Policy H1, as it is not considered that the Council has provided sound justification to support the stipulation of such standards. Planning Practice Guidance is clear that evidence is required to demonstrate need and viability prior to implementing these standards.

The 2017 SHMA provides some justification regarding the need for accessible homes indicating a projected increase in the number of people with a long-term health problem or disability, whilst also indicating a requirement for 8% of the housing need to cater for specialist housing for older persons, such as sheltered and extra care housing.

Whilst we generally support the delivery of residential units to meet the needs of the ageing population and those with health needs, there is little justification within the Council’s evidence base to support the level of 15% of properties meeting Building Regulations Parts M4 (2) and M4 (3). Whilst there is some need within the Borough, particularly for the needs of older people, there is little justification as to the whether all sites would be suitable for this need depending on size, location and need within a particular area.

The Policy also stipulates that 5% of units on development sites of over 100 homes or more to be made available for sale as self-build and custom housebuilding plots whilst there is an identified need. The Council needs to provide justification and evidence as to the suitability of applying this policy to all sites over 100 units, as it will need to be demonstrated that such a requirement is feasible in terms of size, location and need within a particular area.

We would suggest that this policy is unsound and should be deleted, however should the policy remain a degree of flexibility needs to be applied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Policy also stipulates that 5% of units on development sites of over 100 homes or more to be made available for sale as self-build and custom housebuilding plots whilst there is an identified need. Whilst there is a clear mandate for Local Authorities to understand the scale and requirement for self-build properties to provide evidence for the demand for this type of housing, the Council has not provided any justification for this policy. In the absence of credible evidence, the policy needs to be made more flexible in order for self-build to be included in the plan, though not to the prescriptive extent expressed in the current policy.

We would suggest that these aspects of the policy are unsound and should be deleted, however should the policy remain a degree of flexibility needs to be applied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1215  Respondent:  17380865 / Crownhall Estates (Sir or madam)  Agent:  Turley (David Murray Cox)
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1: HOMES FOR ALL
Criterion 1 of the draft Policy requires new residential development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest SHMA. Crownhall Estates consider that this aspect of the Policy should not be applied in a manner which requires the SHMA housing mix to be replicated on each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1392  Respondent:  17381825 / O J S Malhouse  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The eastern side of the Borough is now scheduled to take an even greater proportion of new homes in the Green Belt. It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Land Usage Density - H1 / H13
I object to the removal of the policy on land usage density. Please reinstate provision of the very important minimum and maximum land usage densities policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1492  Respondent: 17400801 / Hannah Punshon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

While the ONS forecasts population for growth for Guildford at 10.4% over the Local plan period, GBC proposes to increase the housing stock by 22%. Since Brexit, forecasts of increasing population numbers have been reduced, yet GBC are continuing to predict massive increases in population, which quite frankly, does not make sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1554  Respondent: 17404801 / Steve Punshon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1587  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H1: Homes for all

3.8 GVG supports the focus within the Local Plan to provide high quality homes to meet a range of needs across the borough.

3.9 The reasoned justification in para 4.2.3 sets out the need for development as supported by the SHMA and addendum report 2017. This demonstrates that there is a high need for one bedroom (40%) and two bedroom (30%) dwellings. These dwellings are clearly more suitable in a town centre environment and this provides further justification for the role
of Guildford town centre as recipient of housing. It highlights the requirement for a comprehensive regeneration of the town centre to be placed at the centre of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1619  Respondent: 17407969 / Jason and Caroline Brennan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the proposed plans in view of flawed evidence. Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3277  Respondent: 17417729 / The Co-operative Group and Scape Living (TCG SL)  Agent: Barton Willmore (Ben Shaw)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

[Text of attachment reproduced below]

6. Draft Policy H1(5) of the emerging Local Plan considers student accommodation. This part of the Policy directs purpose built student accommodation for full time higher education Guildford based students on campus locations where appropriate. The Policy states that about 60 per cent of full time Guildford based University of Surrey students are expected to be provided within accommodation on campus. It is implicitly assumed that there is no material change in student numbers within other institutions.

7. The supporting text to this Policy states, in relation to monitoring the contribution of new homes against the identified local housing requirement, that “Purpose built student accommodation on campus…are considered separately from general housing needs in this plan” and “Any additional student accommodation or residential institutions built over and above the projected need (as identified in the SHMA) will count towards the general housing requirement, based on the amount of accommodation it releases into the general housing market”.

8. These statements are considered to be unsound and flawed when interpreted against the guidance set out within the Planning Practice Guidance (‘PPG’). The PPG is clear at Paragraph 038 that:

“All student accommodation, whether it consist of communal halls of residence or selfcontained dwellings, and whether or not it is on campus, can be included towards the housing requirements, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double counting”.

9. The PPG recognises the importance of purpose built student housing on mitigating the pressure on market housing. The PPG states at Paragraph 21, inter alia, that:
10. The Council’s approach of considering purpose built student accommodation, on campus, separately from the general housing need, does not take into account the impact this may have on market housing. Both Paragraphs within the PPG makes clear that student accommodation need should be planned for and addressed through the plan-led process.

11. The West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 (‘SHMA’), prepared by GL Hearn on behalf of Guildford Borough Council (‘GBC’) sets out recent trends in student growth in Guildford and the number/proportion of students which can be expected to require housing within Guildford. The SHMA directly informs draft Policy within the Proposed Submission Local Plan. We consider that a number of inaccurate assumptions have been made within the SHMA which has resulted in the underestimation on the impact student growth will have on the housing market.

12. Firstly, the SHMA only assesses the estimated growth in student numbers in the UoS, which is the largest but not the only institution within Guildford Borough. The Proposed Submission Local Plan, at Paragraph 4.2.16 recognises the variety of further and higher education establishments which include, Guildford School of Acting, the University of Law, Guildford College including Merrist Wood, the Academy of Contemporary Music and the School of Horticulture at RHS Wisley. There is no mention on the future growth of any of these institutions or the impact any future growth may have on the local housing market. Without a buffer within the OAN to include the impact of all institutional growth, there is potential that the conclusions set out in the SHMA on student growth and impact on local housing market are underestimated.

13. The SHMA states that the aim of UoS is to provide accommodation for 50-60% of full-time Guildford-based students. On the basis that 55% of these students live within halls of residence, and 45% can be expected to live in the wider housing market.

14. The SHMA sets out a total of 15,280 UoS students in 2015/2016 of which 92% equated to full-time equivalents (14,005) and 70% of the full-time equivalents (10,700) were based in Guildford requiring accommodation in the Borough. UoS is planning to increase the total headcount of students to 23,000 by 2026/27 academic years.

15. The SHMA states at paragraph 7.5 that the “proportion of the total students which is full-time Guildford-based could be expected to fall from the current level of around 70%, for instance as a result of growth in degree apprenticeships and foundation students”. We consider there to be no appropriate justification or evidence to support this statement. The SHMA continues to state that “the number of full-time Guildford-based students is expected to increase from 10,700 (2015/16) to around 14,500 over the next ten years (to 2026/27)”. This is only 63% of the overall anticipated head count of 23,000 students in 2026/27 academic year. Given that there is no justification or evidence for this 7% decrease in full-time Guildford based students there is potential that the conclusions set out in the SHMA on student growth and impact on local housing market are underestimated.

16. We consider that the SHMA should have applied the current level s of 70% of full-time students to be Guildford based, as this can be based on clear evidence. This is a consistent approach within Appendix C of SHMA 2015. This would equate to 16,100 full-time Guildford based students and uplift of 5,400 students by 2026/27. This would then equate to 2,430 students expected to live within the general housing stock (45%). On the basis that the SHMA deems there to be an average of 4 students per household, this would equate to around 608 dwellings over the 17-year Plan period, equating to an average of 36 dwellings per annum moving forward. This is an adjustment of an additional 12 dwelling per annum against the SHMA’s conclusions and the Borough’s overall housing need.

17. Notwithstanding, the SHMA continues to state that “there is some uncertainty regarding longer-term growth, and we have not therefore made any assumptions about longer-term growth in student numbers” (our emphasis) and that “given the aspirational nature of the University’s growth expectations, we have assumed that this scale of growth (3,800 additional full-time Guildford-based students) is achieved over the plan period to 2034”. We consider that the SHMA fails to take into account the impact of student growth on the local housing market in the last 7 years of the Plan-period, and therefore the impact could well be underestimated within the OAN.
18. Critically the SHMA also identifies that 1,710 (or 45%) of UoS students could be expected to live within the general housing stock which is in addition to any purpose built requirement. Such a number can be increased when the other Education Institutions in the town are included in the analysis. As such, the town’s private housing stock is accommodating a significant number of students in the private sector that could otherwise be accommodated either on-campus (where the places exist) or in purpose built student accommodation. Purposed built student accommodation should be promoted through the Proposed Submission Local Plan to positively free-up current and future private stock, being used for student accommodation, for the use of private sector requirements, particularly those with affordable needs. This is recognised by the PPG which recognises the importance of purpose built student housing on mitigating the pressure on market housing, specifically the private rented sector. It may then also place less pressure on the overall private sector housing target.

19. It is therefore concluded, that the Evidence Base is incorrect in relation to student growth and the impact on the OAN. Based on the significant need identified by SL in discussion with both UoS and other Institutions in the Borough, it is considered that there is a far greater need for well-located and accessible purpose built student accommodation than the Plan and Evidence Base accounts for.

20. Paragraph 4.2.9 of the Proposed Submission Local Plan, relates to family housing and recognises the number of children under 15 is projected to increase throughout the Plan period, and that the Council needs to plan carefully for family housing. This will be encouraged through a reasonable quality and size of accommodation in the private rented sector, in particular two and three bedroomed homes.

21. It is clear that the 45% of full-time Guildford-based students would be in direct competition with affordable family homes, of which the Council see as a housing priority. If the OAN figure is underestimated in relation to impact of student growth, there will be a direct impact to the local housing market and specifically affordable family homes.

22. Against this background, we recommend draft Policy A13 of the Proposed Submission Local Plan is amended to include specific allocations for student accommodation (Sui Generis). The allocations should be based on updated Evidence Base which accurately reflects the needs of all of the Town’s Educational Institutions (not just UoS) and places a much greater emphasis on removing students from the private affordable sector.

23. We would welcome an opportunity to input into the updating of the Evidence Base and to formulate an appropriately worded policy with GBC before this Plan is submitted to the Secretary of State and the subject of Examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The future of Guildford borough:

The local plan seeks alignment with the council’s corporate plan 2015-20 which establishes the ambition for Guildford to be ‘a town and rural borough that is the most desirable place to live, work and visit in South East England.’ It goes on to say that ‘we want Guildford to be a centre for education, healthcare innovative and cutting edge businesses, high quality retail and wellbeing…’ This plan does not seek to fulfill the above intentions as it aims to provide low cost housing and industrial units (supporting a town which has rejected high quality retail development in favour of low status anchor tenancy for shopping centres in the future – to the dismay of many residents and council tax payers).

Mixed housing

Guildford’s housing requirements seem confusing as the basis for calculations has not been disclosed. Guildford attracts and maintains a mature and more wealthy citizen. Whilst the aim to provide housing for the younger generation is of course essential and well intentioned there does not seem to be any correlation between the proposed future prosperity of the borough and the looked for increase of workers in the borough doing the jobs and earning the wages we see advertised. I worry that older, wealthier people will move out as a result of the changes proposed and be replaced by low paid individuals who will be less able to contribute to the overall economic sustainability of the borough. There is a lack of information concerning the jobs and work that would be undertaken and mention of employment by local hospitals and care homes is clearly a statement of intention to attract low paid workers requiring very low cost housing.

Policy H1 of the Local Plan (Homes for all) sets out to ensure new development provides a mix of housing tenures/types/sizes, appropriate to the site size, characteristics and location, with a view to meeting the accommodation needs established by the latest Strategic Housing Market Assessment (SHMA). It says that as well as the benefits it can provide to people’s lives, families and communities, suitably sized, priced and located housing can also help to support the economy by ensuring people with a wide variety of occupations can live in the borough. I refer to comments above concerning the availability of jobs and their wages in order to affirm this aspiration. Is there any assurance that the houses proposed will be low cost? (This is not the usual experience in the borough nor of the intentions of developers as can be seen by very recent small development within Ripley and Send. New cottages built in Newark Lane cost in excess of £half million and new houses at Skeens Lane in Send have been marketed for £690.000 - http://www.rightmove.co.uk/house-prices/Send.html)

A large area of low cost housing suitable for low paid residents does not fulfill the aspiration of supporting the economy.

Policy D4 (Development in urban areas and inset villages) requires that: “proposals for new development within inset village areas will have particular regard to: the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape; important views of the village from the surrounding landscape and views within the village of local landmarks.” As previously mentioned this proposal does not fulfill this requirement particularly in the area of the distinctive settlement pattern of the village.

The SA details that where developers demonstrate that providing the amount of affordable housing required by policy would not be economically viable, the Council will follow the following cascade mechanism to assist with delivering a scheme: 1) vary the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; 2) reduce the overall number of affordable homes. The door appears to be wide open for the council to move against its stated local plan provisions in order to allow future developers to demonstrate that ‘affordable housing’ is not actually economically viable and that they should be permitted to make more money by building larger houses. What is actually the driving force behind these proposals? Without this knowledge I object most strongly. The SA concludes that there remains some uncertainty regarding delivery of an appropriate housing mix more generally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The policy is unsound because it is ineffective and unjustified.

The Council have not provided the necessary evidence to support the implementation of optional building regulations M4(2) and M4(3)(b). Planning Practice Guidance is clear that evidence on both need and viability are required in order to justify the implementation of these optional standards. National Planning Practice Guidance is clear that:

“Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations.” Paragraph: 007 Reference ID: 56-007-20150327

“Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment.” Paragraph: 003 Reference ID: 56-003-20150327

We are therefore concerned that this addition to policy H1 is not justified and should be deleted.

Part 9 of the policy, which relates to self-build and custom housebuilding, will present considerable difficulties in terms of its implementation. The policy refers to the requirement for all developments of 100 homes or more to provide plots for self-build and custom housebuilding. However, this would mean that flatted developments would be required to provide such plots. Clearly it would be unreasonable and impossible for such schemes to meet this policy and the Council must be more specific regarding the scenarios in which this policy will apply. At present developers will not be certain as to the implications of this policy. Given that paragraph 17 of the NPPF outlines that predictable decision making is a key element of plan making we consider part 9 of policy H1 to be unsound as it is not consistent with national policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I would like to express my concerns about the changes (or rather lack of) in respect to POLICY H1 “SELF BUILD AND CUSTOM BUILD”.

I feel the proposed policy is far too restrictive in that it is saying that it expects large housing sites of over 100 homes to provide 5% as self build plots and that the council may require these dwellings to be developed in accordance with an agreed design code.

I believe this, in reality, will only result in self build plots being available on large housing estates and built according to an overly controlling and restrictive design code. This policy is not going to encourage self build as is a far cry from most people’s perceptions of the idea of self build. The government is keen to promote self build and the market is growing but in my opinion this policy is a backward step.
I do not see landowners of smaller sites (less than 100) offering their land for self build plots as the large developers they negotiate with will be wanting to control the whole site for their end product and will not want self build plots forced upon them.

I believe the council should allocate several small sites as dedicated self build sites and allow greater flexibility over design within set parameters.

The Council probably has 250 names on its self build register by now and there is much talk of these larger strategic sites not coming forward in the earlier part of the plan. If these large sites do not get planning in the early part of the plan how is the council going to comply with its duty to grant enough planning permissions for self build by the end of the third base period? It should have a fall back position.

In my opinion the Local Plan needs to build in more flexibility with regards to its self build policy and offer more choice to the self/custom builder.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Surrey University has more than sufficient land to develop for students approvals have yet to be commenced when built would reduce demand for rented property in Guildford making available for local workers and families. The University should be develop their land before any “ Developers” bonus from sale of Blackwell Farm is paid into their coffers. Areas such as the open air car parks empty for long periods throughout the year, these car parks could be redeveloped with under ground parking to meet demand with student accommodation in blocks of up to 5 storeys high which would not be detrimental to area. Students on site Campus with own facilities result less travel or use the park and ride facility.To develop the sites the University would need to raise commercial funding which apparently they are not prepared to consider as it is expensive an no immediate return. By selling Blackwell Farm as residential development land the value would dramatically increase over farmland, they want their cake and eat it !. I appreciate a large number of local residents are employed at the University =more students + greater number of tutors and other employees + more road travel as many will be living in other parts of Guildford but preferring to travel by road for time convenience rather than local transport. The proposed train station is unlikely to reduce dependency on road network due to distance from proposed housing and commercial areas. Will probably benefit hospital staff and patients, although they would first have to travel to their local station and with poor bus services seems unlikely to have large take up.

The land bank already approved by GBC for development the University should be developed before other off campus sites. Surrey University could comfortably develop those locations and increase student accommodation by utilising the open space car parks which are vacant for much of the week and year. By building underground car parks with student accommodation above the land would be put to better use, reduce the volume of traffic and pollution. The University should be asked to seriously consider however there would be the commercial investment required which the University are unlikely to entertain. We believe the University should not be able to increase the number of students recently reported as an increase of 6,00 until they can accommodate students on the various campus, not to the detriment of residents many of whom own their own homes and will see the area West of change for the worse with over development, poor infrastructure and increase noise, pollution and traffic. The change in the environment would not bring any benefits to current residents, we fail to see anything in the Local Draft Plan which enhances the West of Guildford.

The proposed development to the West of Guildford is in excess of what the town requires and with very limited road infrastructure opportunities to dramatically improve the flow through Guildford on the A3 the area of the North Downs will be destroyed. Current problems would not be solved by the planned road layout alterations as the infrastructure is...
totally inadequate. Despite numerous surveys at great expense no realistic affordable practical proposal has been suggested. Road network must be the key to size of any development at Blackwell Farm. The past two weeks I have found it impossible to travel through Onslow Village to join Madrid Road and head towards A3 the village and surrounding roads grid locked 8:00- 9:30 such issues will increase which has an effect on not just myself but others living in the area trying to get to work. Our quality of life has not been considered in the plan which is driven by seeking unsubstantiated annual housing targets.

A recent article from the University supporting the development made mention of the expected increase in number of students and the need to house them. The correspondent also commented on the students bringing value to Guildford. They do not pay rates on properties they rent, some leave mess outside the properties and as I write at end of the year several late night parties disturbing the residents. the situation in respect of rates provides a lost opportunity for Guildford Borough Council the funds obtained could be used to benefit local residents. We believe about 1500 homes plus are rented to students losing the Council in region of 2 million pounds per year in rates revenue. How much does Surrey University contribute in rates for their campus?

There are a number of vacant office blocks which could be converted to residential as demand does not appear to be for commercial occupancy. The Commercial Park at the old Denis site could be relocated to Slyfield and the area developed with multi rise units near to station, town centre and university without having much of an effect as the environment.

Development is required in Guildford however we question the analysis to predict of future growth patterns for a good number of years hence, already reduced on re examination following the previous Local Plan and probably requires further assessment prior to final draft. Any new homes should cater for bungalows, 1 bed. 2 bed back to back starter homes, 2/3 bedroom terrace properties and semi detached, not just the larger 4 bedroom homes, otherwise the young and old of the borough would not have opportunities to buy a first home or down size to free other homes in the borough for the “suggested” numbers moving to Guildford, the town is almost at saturation point for reasons mentioned above. Affordable homes is a miss conception new developments are built by developers to maximise profit not out of goodwill to benefit purchasers.

On a general note with the increase in housing there is limited additional recreational facilities for the normal family who cannot afford to use Surrey Sports Park or the Leisure centre, few open spaces to make up for the loss of natural habitat and open spaces at Blackwell Farm/slopes of the Hogs back,loss of environment and playing fields for football, cricket and such like. Bus routes and park and ride are under unitised the idea public would use and the train station are we believe over rated. The very heavy rain these past two days also raise the question of flooding, the Blackwell Farm site is in the basin below the Hogs Back, presently the run off from road and chalk downs is to the lower farm areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to these homes because they will add further pressure to our roads which are already unable to cope with its traffic demands. It will also have major detrimental implications to our rural environments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2121  Respondent: 17445345 / Albury Parish Council (Joanna Cadman)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 37-38 4:2:3 and 4:2:9 Housing

Although the borough identifies the need for building smaller dwellings, developers prefer to build larger dwellings where their margin is greater. Therefore, in its current form the Plan does not provide any guarantees that it can deliver smaller housing that is needed.

Page 38:2:8

This paragraph should be retained. Respecting density especially existing street patterns, plot sizes and space around buildings is key to preserving the character of our villages and towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2157  Respondent: 17446113 / Phil Davie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

General Evidence and Policies

Housing Requirement: I OBJECT to the figure of 654 houses required each year between 2015 and 2034 as being too high. Guildford Borough Council will not publish details regarding how this figure was derived. It therefore remains impossible to support the sudden increase in housing numbers from previous annual figures of 322.

Inset Green Belt land: I OBJECT to the proposed inset of Send Business Park from the Green Belt (Green Belt Policy 2 at Paragraph 4.3.15) because

- This is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. It must be protected from further development.
- The site contains an Area of High Archaeological Potential (AHAP – reference 2003 Guildford Local Plan) which requires significant protection to be continued.
- There are no special or exceptional circumstances identified which justify removal of the Green Belt status.
- Developments in the area will harm the open aspect of the area and views associated with the Wey.
- Access to the site is along very narrow roads which can neither safely support existing traffic nor the additional traffic to be expected both during site development and subsequent use.
Process: I OBJECT to the failure of Guildford Borough Council to allocate housing development proposals evenly among its constituent parts, instead focusing disproportionate development within Send Parish.

Process: I OBJECT to the failure of Guildford Borough Council to recognise and act on the large number of objections relating to proposals for Send and made during the 2016 consultation activity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2226  Respondent: 17452673 / Philip and Maureen Blunden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In view of flawed projections, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion that cannot be justified in our heavily constrained borough. There is evidence Guildford’s population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies. If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford, and also aggravate congestion.

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB. Even taking account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the plan period.

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2306  Respondent: 17456961 / Justine Ayears  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strongly to the deletion of para 4.2.8 on housing density. There must be an efficient use of land in keeping with the local area. It is notable than the development planned for the town centre is at a lower density than that at site A35 for example and this is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2616  Respondent: 17464481 / Robert Harvey  Agent:
As a local resident of Elm Corner, near Ockham, I am very aware of the current proposed draft local plan. Firstly, it is with considerable concern that I notice that the development proposed for Three Farms Meadows is still in this draft. The proposals for this site were turned down unanimously by the Council not that long ago and as far as I am aware, hardly any of the issues that gave rise to that unanimous decision have been addressed. This is either localism, which was proposed by the Conservative Government, being ignored, or a total failure of the Council to consider the possibility that housing provision needs to go elsewhere.

More specifically, it is clear that there is a substantial housing shortage in the country as a whole, some of which is required in Surrey. I understand that small infill sites and in town brownfield or redundant sites can be expensive to develop and all developers would therefore prefer a large open space to enjoy maximum potential profit.

Such economic requirements have to be looked at in a rational manner, balancing need with environmental considerations as well as the ability of local existing infrastructure to cope with these large scale developments. The local plan has spectacularly ignored these fundamental principles of planning law particularly in relation to the Three Farms Meadows site.

There is no question that housing development requires suitable infrastructure such as good public transport and access to it, a good road network for access, safe pedestrian and bicycle routes, sewerage, drainage, telecoms and basic facilities.

Although some of the sites identified in the local plan fulfil a majority of these needs, some fail to cover any in a sustainable way.

I am not a nimby as recently reported by a senior Government minister as I do feel that housing, particularly affordable housing is a high priority generally but to put it somewhere that fulfils the need but fails to satisfy any basic planning rules, is at best lazy and at worst driven by political dogma rather than sensible thought.

I therefore fundamentally object to the adoption of the current draft of the local plan and in particular, to the ludicrous inclusion of Three Farms Meadows, as a sensible option for satisfying the important need for new housing.

I also object to the number of houses that are projected to be required in the Guildford area, as I believe that this has been calculated using outdated and inaccurate information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am dismayed that the revised Local Plan 2017 has not heeded the objections and concerns of residents that were sent to the 2016 Local Plan!

I believe that the new evidence submitted is flawed and that Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of the Green Belt and green character and increased congestion, that cannot be justified in our heavily constrained borough.
I suggest that you take a drive around the Guildford bypass and the A3/M25 junction on a Monday morning then ask yourself just how many more homes (and therefore cars!) the area can take.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2711  Respondent: 17469729 / Philip Cefai  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2017 New Local Plan.
The utilisation of “Green Belt Land” in order to meet housing requirements is damaging to the area and population.

The suggestion by Labour Peer Lord Adonis to double the size of the population in Guildford to 224,000 these are figures pulled out of the air with no substance.

The plans put forward by Guildford Council of over 13,000 new homes for the area is unsustainable.

Providing a housing overflow in our Green Belt Land for Woking is an awful idea. Congestion in the area is already severe. Plans proposed by Guildford Council will make travel in the area even worse during the plan period and beyond.

Providing 60% accommodation to Guildford University students will only impact on properties in Guildford town. This needs to be increased in order to free up affordable housing in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1432  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The Government has indicated a commitment to self-build and custom house building plots and there is a requirement for local authorities to keep a register. However, the Government has not yet finalised its stance or published policy in relation to the specifics of the initiative. With the impact of the Brexit referendum and new Government, delays have been introduced, not least in the amendment and republication of the NPPF. Government guidance at the time of determining a planning application would be a material consideration that will be looked at as part of the planning balance and self-build and custom housing could be required in due course, in the same way as affordable housing is required within housing developments.

Further, there is little evidence as to the extent of demand for self and custom built houses within the Borough currently. According to the GBC Housing Mix Topic Paper there are 87 individuals on the register in the first base period and 80 who are seeking plots of land in the Borough. Whilst it is recognised that this is a snapshot, it is a very small number across the 19 year plan period - equating to just 4 per annum. The West Surrey Strategic Housing Market Assessment 2015 considered self build opportunities and considered that whilst there could be potential to designate plots within larger schemes, most new delivery would be on small windfall sites.
The Topic Paper goes on to state that there is no definitive number of self-build or custom housebuilding plots sought but that the approach that Guildford Borough Council has taken is to seek flexibility by specifying their inclusion on suitable site allocations over 100 homes. The draft policy within the focussed Proposed Submission goes further than this and specifies that 5% of the total homes shall be available as self-build and custom housebuilding plots ‘whilst there is an identified need’. This approach is both unfounded and arbitrary: There is no basis for the selection of sites of over 100 units in size particularly bearing in mind the conclusion drawn in the SHMA that the majority are likely to come forward on small windfall sites; or the selection of the 5% requirement - the need for which the lpa itself acknowledges is uncertain: ‘whilst there is an identified need’. This level of uncertainty will have an adverse impact on development decisions.

We therefore object to the inclusion of the specifics of the requirement for self-build and custom housebuilding at this stage of the Plan making process as being unsound based on inadequate evidence, prematurity in pre-empting confirmation of the Government’s future policy specifics and the level of uncertainty introduced which will have an adverse impact on development decisions. Consequently the policy will be ineffective. The policy should remain as a supporting policy to encourage self-build and custom housebuilding and which can therefore respond flexibly to market demand rather than in its current form which is couched as an arbitrary and unjustified requirement. It is therefore recommended that the Policy be amended to remove these specific elements as follows:

**Policy H1: Housing for all**

...  

**Self-build and custom housebuilding**

(9) Self build and custom house building

Self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character. Such provision will be encouraged on windfall sites of any size. On development sites of 100 homes or more 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. For phased development, self-build plots must be delivered and serviced at the earliest stage possible. Self build and custom housebuilding lots are encouraged on smaller residential development sites.

(10) Self build plots made available must respond to the sizes identified on the register. Plots must be made available and priced and marketed appropriately as self-build or custom build plots for at least 18 months.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Policy H1: Housing for all

...

**Self-build and custom housebuilding**

(9) Self build and custom house building

Self-build and custom housebuilding will be supported where it reflects the identified need within a locality. Such provision will be encouraged on windfall sites of any size.

**Attached documents:**

Comment ID: pslp171/2679  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom
Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
i) The delivery of housing should be reinstated to at least the level set out in the 2016 draft Plan i.e. ‘at least 693 dpa’ but with a further allowance to cover the current shortfall in housing land supply (881 units) plus a 10% buffer to secure flexibility and resilience across the Plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2706  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom  
Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The Government has indicated a commitment to self-build and custom house building plots and there is a requirement for local authorities to keep a register. However, the Government has not yet finalised its stance or published policy in relation to the specifics of the initiative. With the impact of the Brexit referendum and new Government, delays have been introduced, not least in the amendment and republication of the NPPF. Government guidance at the time of determining a planning application would be a material consideration that will be looked at as part of the planning balance and self-build and custom housing could be required in due course, in the same way as affordable housing is required within housing developments.

Further, there is little evidence as to the extent of demand for self and custom built houses within the Borough currently. According to the GBC Housing Mix Topic Paper there are 87 individuals on the register in the first base period and 80 who are seeking plots of land in the Borough. Whilst it is recognised that this is a snapshot, it is a very small number across the 19 year plan period - equating to just 4 per annum. The West Surrey Strategic Housing Market Assessment 2015 considered self build opportunities and considered that whilst there could be potential to designate plots within larger schemes, most new delivery would be on small windfall sites.

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

We therefore object to the inclusion of the specifics of the requirement for self-build and custom housebuilding at this stage of the Plan making process as being unsound based on inadequate evidence, prematurity in pre-empting confirmation of the Government’s future policy specifics and the level of uncertainty introduced which will have an adverse impact on development decisions. Consequently the policy will be ineffective. The policy should remain as a supporting policy to encourage self-build and custom housebuilding and which can therefore respond flexibly to market demand rather than in its current form which is couched as an arbitrary and unjustified requirement. It is therefore recommended that the Policy be amended to remove these specific elements as follows:

Policy H1: Housing for all

Self-build and custom housebuilding (9) Self build and custom house building
Self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character where it reflects the identified need within a locality. Such provision will be encouraged on windfall sites of any size. On development sites of 100 homes or more 5% of the total homes shall be available for sale as self-build and
custom housebuilding plots whilst there is an identified need. For phased development, self-build plots must be delivered and serviced at the earliest stage possible. Self build and custom housebuilding lots are encouraged on smaller residential development sites.

(10) Self build plots made available must respond to the sizes identified on the register. Plots must be made available and priced and marketed appropriately as self-build or custom build plots for at least 18 months.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3264  Respondent: 17580289 / Linda Carter  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The removal of 4.2.8 on density is short-sighted and inappropriate. Density guidelines make the best use of land in the context of the area, its local character and housing type requirements. Therefore a policy to cover minimum and maximum densities is essential.

The provision of a prescribed number of affordable homes in any development is supported. However the viability clause is open to abuse and in practise could be unenforceable. 4.2.40 needs strengthening as it allows developers to exert pressure for profit over market affordability by stating ‘non-viability’.

I object to Policy H1 and H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1442  Respondent: 17976417 / Thakeham Homes (Sir or Madam)  Agent: Vail Williams LLP (J Lacey)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3.1 We OBJECT to H1 criteria (9) and (10) ‘Self-build and custom build’ for the reasons outlined above. Whilst a Custom Housebuilding Register is kept, the principle of Self-Build and custom housebuilding is not a matter outlined in detail within central government guidance or policy. This will in effect sterilise land impacts on the overall deliverability of much needed housing on sites.

3.2 As stated within Section 2 above in the context of Site Allocation A38, Government guidance at the time of determining a planning application would be a material consideration that will be looked at as part of the planning balance. We therefore object to the inclusion of the self-building and custom housebuilding element to policy H2 as it is premature and pre-empting confirmation of the Government’s future policy.

We also believe that an 18 month period to make the plots available and marketed also lacks central Government policy or guidance to endorse the approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Accessible Homes

4.1 As part of the latest consultation document, the Council has included a new policy requirement for at least 10% of developments of 25 or more to meet the requirements of Building Regulations M4(2). Building Regulations M4(2) is an optional requirement which relates to the access and use of buildings, particularly those with reduced mobility and wheelchairs.

4.2 Creating an adaptable dwelling stock is not a bad idea, however it is one which the Council has given very little consideration and the thresholds proposed do not appear to be grounded in evidence. Clearly any requirements above the national standards will involve a different approach and one which may involve adopting non-standardised measures. This matter has not been included within the Council’s viability testing and there is no evidence to justify the figure of 10% proposed by the Council.

Self-build and Custom Housing

4.3 In addition to this requirement, the Council has also introduced a further new requirement as part of this policy relating to the provision of self-build housing. Introduced through the Self-build and Custom Housebuilding Act 2015, there is a clear mandate for Local Authorities to understand the scale and requirement for self-build properties to provide evidence for the demand for this type of housing. The PPG proposes that this is done through the compilation of a Self-build register.

4.4 As a policy response to this, the Council proposes that on development sites of 100 or more, 5% of the total homes are made available for self-build properties. Presently, the Council has not provided any evidence of the total need for self-build properties in the Borough and as such, it is currently unknown how much provision is needed for the purposes of the Local Plan. As the evidence base for the self-build register is not available, the Council’s justifications for this policy are unclear and unfounded. In the absence of credible evidence, the policy needs to be made more flexible in order for self-build to be included in the plan, though not to the prescriptive extent expressed in the current policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
allocation figure should only be considered as an approximant figure until further technical studies are undertaken, in line with an up to date delivery of housing.

The removal of the ‘4.2.8 – Density’ is therefore not supported as each development should be reflective of the local character, context, distinctiveness and the sustainability of the location.

Specialist accommodation housing

Vortal Properties support the inclusion of well-designed specialist forms of accommodation in appropriate sustainable locations such as Site A28.

Accessible accommodation and housing for older people

Whilst the inclusion of 4.2.10 is accepted, the percentage figures required must have the ability to alter both upwards and downwards to reflect figures in the latest SHMA.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Total records: 776.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy H2 - Affordable Homes
Affordable Housing - As a local employer we constantly see young people moving out of the area due to lack of housing. The Council has had building targets for years which they have consistently missed. Until a target for affordable housing is set which is actually enforceable I do not see the position changing. My suggestion is to incorporate a higher target for affordable and introduce an incentive or penalty system to ensure the target is achieved.

Employment - Unfortunately, GBC has a generally poor reputation amongst businesses in the area for being unresponsive, slow to action and lacking understanding of businesses needs. Although this is improving there is still a long way to go. I suggest this section of the plan be enhanced to include response time targets and feedback systems from businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

H2, Affordable homes. P38.

We would like to see a levy on developments of 5 houses or under to help fund affordable housing; it is illogical and unfair that a requirement is only made on larger developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

mm) Policy H2(4) seems reasonable but there must be explicit measures and mechanisms in place to ensure the homes do actually get built. Paragraph 4.2.36 appears to provide sufficient framework to manage this.

qq) In Policy H2 (2) we absolutely do not accept the change of wording that dilutes the obligation (‘must’) to a wish (‘seek’) to have 40% of homes to be affordable. We have explained above that we do not believe the viability test is
robust enough. We anticipate that Policy H2 as now drafted is likely to result in a massive diminution of affordable homes –possibly to below 10% as we have seen in the past and elsewhere.

rr) At paragraph 4.2.40 we consider the following wording should be retained: “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost”

[One or more sections of this comment have been removed because they did not relate to a change to the plan.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/6169  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY H2 – Affordable homes**

We object to this policy on the grounds that it should be more firm and explicit on “unviability” in paragraph 4.2.40. The possibility of avoiding or reducing the affordable housing obligation through use of unviability arguments is likely to inflate land values and lead to appeals.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

Guildford’s popularity and location in the Green Belt, with the Surrey Hills, close to others towns and within the London Commuter belt mean that demand is virtually unlimited and no amount of affordable housing will meet it. The real need is for social or “council” housing but that will not be provided by current developer-led models.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/17424  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**H2 – Affordable Homes**

Report page: 9

WHPC view: Objects

In brief: Fails the test of sustainability and should be radically revised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**POLICY H2: Affordable Homes**

**WHPC Objects to Policy H2**

WHPC supports the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term. Readers of this submission should note that the average 2016 market price for a 3 bedroom semi-detached house in West Horsley is £581,031 well above the average price of £432,580 for a semi-detached house price in Guildford. The 2016 average price for flats in Guildford is £282,070.

In this policy GBC sets out no strategy to recognise and deal with the differences in affordable housing need and price across the borough. In West Horsley, there is some demand for affordable housing but other factors, e.g. transport to workplace considerations, lack of transport and shopping facilities, are key influencers for persons on low incomes. A Summary of the West Horsley Housing Needs Survey May 2014 is included in Appendix 2.

Under Policy H2, 40% of all but the smallest development sites in West Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more affordable housing in the parish. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for 2 to 3 bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there, nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2075</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent: Fiona Curtis</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )</td>
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</table>

I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/2323</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
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</tbody>
</table>

4.2.30 There is no mention of proximity to London and is THE KEY reason why Guildford is sought after and highly priced.

Object due to omission

4.2.32 The affordability ratio for Surrey is more relevant than that of the whole of England. I therefore object to the removal of the comparison to Surrey in favour of England.

Object

We will seek at least 40 per cent of the homes on

This policy has been weakened by removal of 'must be' to 'we will seek'. Gaining 40% affordable homes is important and every effort must be made to attain this. Weakening this policy at this stage is a clear indication that the volume of affordable homes

Object
these sites must be as affordable homes. is expendable. This is amplified by the removal of 'Developers will be expected to provide land for affordable homes at nil value."

I am concerned that the number and type of home needed as identified by the SHMA will be built irrespective of the affordability aspect and this is the deciding factor for many people and is more important than having a spare bedroom or even a garden. Given the cost of housing in Guildford and the belief by most that building will not reduce the price of housing, it might be more helpful if the emphasis were on building more starter homes and smaller well designed flats and truly affordable homes rather than percent of market value.

4.2.41 How can failure to use land efficiently be measured if density requirements are removed from policy? They must be added.

I object to greenfield development, especially development on countryside that is designated for protection such as Green Belt (before the Council’s proposed changes), or is quality agricultural land, or is making a valuable contribution to biodiversity without any statutory designation. If the housing number had been calculated realistically and brownfield sites allocated for genuinely affordable housing rather than retail or business expansion there would be no need to hand over our countryside and villages to developers. This can be taken as a general objection to greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13035  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object.

55. No consideration has been given to where affordable housing is most needed and current Government policy does not support the retention of affordable housing stock such as social housing. The definition of “affordable” means that such housing in the Borough will not be genuinely affordable while, in parts of the Borough with very high market prices and
rents this will simply be used as an investment opportunity by those who can afford to buy at a high, but discounted, price.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1673  Respondent: 8573793 / Harry Eve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The current definition of “Affordable” does nothing to help key workers in Guildford.

The policy has been further weakened in favour of developers’ profit (policy item (2)).

The issue is partly a problem of Government policy concerning the affordability definition and the right to buy (continually eroding the social housing stock) - and partly due to GBC’s reluctance to subsidise sufficient genuinely affordable housing for key workers (exacerbated by cuts to local authority budgets).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5950  Respondent: 8575585 / Ian Macpherson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2: Affordable Homes

The recent Government policy on affordable housing [ eg starter homes for first time buyers, and sale of Housing Association properties] is recognised by most commentators as a mess. However, there-it-is [ until amended] and this is not reflected in the commentary here, which seems to be based on previous practice. Perhaps it should be re-considered?

Viability calculations should be based on the latest SPD from Islington London Borough Council, which seems generally accepted as sensible by other LBs, and by reason of their position in the Development world have been up thefront of the debate over viability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6980  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
H2 Housing - Affordable Homes

EPC supports the principle that 40% of new homes should be affordable. It trusts that these affordable homes will include starter homes for purchase in the market (under new Government legislation) where the homes are for first time buyers who are under 40 years of age.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7190  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

H2 Housing - Affordable Homes

EPC supports the principle that 40% of new homes should be affordable. It trusts that these affordable homes will include starter homes for purchase in the market (under new Government legislation) where the homes are for first time buyers who are under 40 years of age.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17328  Respondent: 8579649 / Home Builders Federation (Mr James Stevens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy is unsound because it does not accord with national policy.

The Council requires that all sites of five or more dwellings, or 0.17 hectares or more, should provide at least 40% affordable homes. The Council should amend the policy to reflect the national policy as set out in the Written Ministerial Statement of 28 November 2014. The Council may implement a lower threshold whereby schemes of six or more dwellings can contribute cash payments towards affordable housing and tariff style items, but only in designated rural areas under Section 157 of the Housing Act 1985. If the Council wishes to adopt this lower threshold in these areas it will need to specify which areas these are in the local plan.

These changes in national planning policy will not apply to Rural Exception Sites.

The policy should also be amended to refer to the Government’s intention to introduce Starter Homes. The tenure split that is proposed whereby 70% of the units would be provided as rented would probably not work alongside the Government’s stated intention that 20% of the affordable housing should be provided as Starter Homes on each qualifying site (see page 13 of the Starter Homes Regulations, Technical Consultation, DCLG March 2016). Schemes of 9 units and fewer and less than 0.5 ha will be exempt from making Starter Homes contributions (see page 12 of the DCLG paper).
The use of the words ‘at least’ is unjustified. It is unclear how an applicant should respond to this wording. This does not provide the precision required from development plan policies to enable applications to be determined quickly (NPPF paragraphs 15, 17 and 154).

We have noted the supporting Viability Assessment. This seems to support the case for a uniform rate of 40% across the district but we are concerned that some other development costs as a consequence of local policy may have been overlooked. This is the case with CHP provision and the tighter water efficiency standard.

The words “the tenure and size of affordable homes provided” should be amended to read instead: “the tenure and number of bedrooms in the affordable homes provided”. This is necessary to avoid the possibility of any confusion that the Council is intending to adopt the Nationally Described Space Standard. We note that the Council does not intend to adopt the Nationally Described Space Standard through this Local Plan. If it did mean to do so, it would need to ensure that it had meet the various tests set out in the NPPG. The Nationally Described Space Standard can only be adopted as policy through the Local Plan. It cannot be introduced via SPD.

**Housing land supply**

We note the composition of the housing trajectory on page 43 of the *Housing Delivery Topic Paper*. We understand the reasons for the stepped trajectory although we feel a flatter trajectory may be more prudent to ensure that the Council is not faced with needing to provide too many completions towards the end of the life of the plan.

5 or 20% buffer

- The Plan is unsound with regard to the buffer because the Council’s approach is unjustified in terms of national policy.

- We note the discussion on page 42 of the *Housing Delivery Topic Paper*. Unfortunately, it is not altogether clear which percentage rate the Council has determined that it is appropriate to apply. We think that the Council is arguing in paragraph 4.171 that it is unrealistic to apply a 20% buffer, even though its track-record has been a poor one if one chooses to measures performance against the SEP target of 422 dpa or the DCLG household projections.

We are not sure that the Council’s argument that expecting it to deliver the deficit and a buffer of 20% is ‘unreasonable’ should carry much weight, especially since we have already conceded that the Council may need to adopt a back-loaded trajectory (with the backlog accrued since 2013 being addressed over the full plan period) to reflect the way in which its strategic sites will come to the market. The Council has been a poor performer in the past and it must do more to correct that failing and its consequences for those in housing need, by releasing more readily developable sites now.

Although the new local plan represents a much more positive strategy by the Council than had been its approach hitherto, to some extent the Council has forfeited its right to be a 5% authority owing to its poor track record. The purpose of the 20% buffer is to provide a realistic prospect of achieving the planned supply as well as providing more choice and competition in the housing and land market. Evidence from the past suggests that there is a risk that Guildford Council may default on delivery.

It is the HBF’s view that a 20% buffer should be applied in every local authority area in order to help boost housing delivery and to provide more competition in the short-term. Small housebuilders cannot wait. They need to be supported by the plan-led system now. We note that LPEG report recommends the universal application of a 20% buffer.

**Dealing with the deficit**
On the basis of the housing trajectory provided, we assume that the Council intends to address the deficit accrued to date over the life of the plan (Liverpool), rather than in the first five years (Sedgefield). It would be helpful if the Council clarified whether this is the case.

We assume that the five year supply will be calculated on the basis of the figures provided on page 43 of the Housing Delivery Topic Paper. We note that the Council will be providing fewer homes each year in the first four years following adoption than the annual average monitoring figure of 693 dpa. Only in year five does the trajectory show completions exceeding the annual average monitoring figure. The consequence of this is that completions will need to sharply escalate towards the end of the plan (back-loading). We have some reservation about this.

The Council considers that an emphasis on earlier delivery may compromise its highly sensitive green belt sites (see paragraph 4.171 of the Housing Delivery Topic Paper). We disagree. If a site is considered suitable for residential development and is allocated as such, then the question of insensitive development should not arise because the site has been assessed as being one suitable for development.

We consider that there is a case for providing more by way of a contingency by allocating some of the other green belt sites with low sustainability scorings. This would provide some lee-way for the Council: the more sites you have, across a wider number of areas, the greater is your chance of sustaining delivery in line with the trajectory. There is always a risk that some of the larger strategic sites may not yield all the units required. Identifying some additional sites would help avoid the risk of under-delivery.

**Windfall**

We consider that the Council’s windfall expectations are realistic. The Housing Delivery Topic Paper (June 2016) in paragraph 4.139 states that the allowance for windfall is 50 dpa for years 6-10 and 11-15 and only 25 in years 1-5. This is quite modest compared to many other south east authorities who typically operate allowances of 100 dpa upwards. We note that this relatively modest windfall reflects the national policy presumption against the development of residential gardens which the Council tells us had previously formed an important component of past supply (see paragraph 4.136). The windfall allowance is realistic and the Council’s policy towards in-setting a number of villages from the green belt (Policy P2) will help to ensure that these windfalls will materialise.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
A certificate of ultimate ownership should be considered within this policy so that they remain ‘affordable’ within the life of the building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/12177  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:</th>
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I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**POLICY H2**

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<th>Respondent: 8594177 / Michael Conoley Associates (Michael Conoley)</th>
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<tr>
<td>Policy H2: Affordable homes</td>
<td>The provision of affordable housing is dependent on it being financially viable for developers to build market housing. Whilst the policy notes that affordable housing contributions may be provided off-site, or with payment in lieu where the Council agrees that on site provision is impractical, the 0.17ha site area criterion set by the policy triggering affordable housing provision is so restrictive that many sites appropriate for development will not be financially viable. Therefore, financial viability studies will be required even for the smallest developments.</td>
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<td>Affordable housing simply is not affordable in this area.</td>
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I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17290  Respondent: 8599617 / Countryside Properties (UK) Ltd (Richard Kennedy)
Agent: JB Planning Associates (John Boyd)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Representation on Policy H2: Affordable Homes

Introduction

Policy H2 sets out affordable housing requirements for the Borough.

National Policy

The affordable housing policy wording needs to be amended in order to reflect the implications for the Local Plan in terms of the Court of Appeal judgment in Secretary of State for Communities and Local Government v West Berkshire District Council and Reading Borough Council [2016] EWCA Civ 441, and the subsequent changes made to the Planning Practice Guidance (PPG) as a result.

Test of Soundness

In view of the above considerations, we consider that the Local Plan is not sound, because it is not ‘consistent with national policy. The Plan needs to be updated to accurately reflect the recent change to national policy.

Proposed Change

Policy H2 needs to be updated to reflect the outcome of the above Court of Appeal decision, and the subsequent changes made to Planning Practice Guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<th>Comment ID: PSLPP16/11181</th>
<th>Respondent: 8602337 / Cross Group (Mr Colin Cross)</th>
<th>Agent:</th>
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<tr>
<td>Policy H2 - Affordable Homes</td>
<td>I object that developers can be released from their obligation to provide affordable homes (clause 4.2.40). If planning permission is granted to include affordable homes, that must be enforced to ensure the developer provides them.</td>
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<tr>
<td>Affordable homes – The wording of Policy H2 Affordable Homes has been weakened to include phrases such as ‘we will also seek affordable homes on sites providing five or more homes ….’. The original wording is much stronger and better and ensures that the affordable homes policy has no ‘wriggle room’. This is essential as ensuring more affordable homes are built is very important.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/1042</th>
<th>Respondent: 8608865 / WBDRA. (David Bird)</th>
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<tr>
<td>COMMENT</td>
<td>WBDRA in general supports the concept of homes which are reasonably priced and affordable by those who need such housing most in the Borough who are Key Workers and young families.</td>
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<td></td>
<td>What WBDRA would like to see is a bold building approach taken by our council in partnership with a developer to build a great number of starter homes - Guildford has the brownfield sites to do this.</td>
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<td></td>
<td>The last thing we need in the Borough are more 3/4 bed executive home developments favoured and generally built by developers.</td>
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<td>Coupled with this our Council should take a much tougher stance with Surrey University and insist that the University gets on with building the homes for students for which it has planning approval. This would mean all students live on campus which would free up hundreds of family houses for sale or rent to Guildford families.</td>
<td></td>
</tr>
</tbody>
</table>
POLICY H2 – Affordable homes

We object to this policy on the grounds it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We note and support the following policies in the Plan:

7.3 **Policy H2** on Affordable Homes and **H3** Rural Exception Homes

7.3.1 We strongly support the proposed lower threshold for affordable housing on sites providing 5 or more homes of which at least 40% must be affordable.

7.3.2 As a village parish we are acutely aware of the problem of local families being unable to stay living within the area in which they have grown up. The attractiveness of the whole borough means that the pressure on property availability and price is immense. The Settlement Hierarchy document indicates that Chilworth has a shortage of three-bedroom accommodation, the impact of which is to break-up the local community. Similarly the nature of property in Shalford is such that young people who have grown up in the village are unlikely to be able to afford property in the area when they leave home. We would urge GBC to acknowledge the needs of local people as an integral part of any long-term plan for the borough.

7.3.3 Following our Shalford Housing Needs Survey (September 2012), we have worked with the Affordable Housing Team to identify potential rural exception sites in order to provide affordable housing specifically for those with genuine local connections. This simply emphasised the difficulty in finding areas acceptable for development, but the Parish Council is committed to following this project through to fruition and there may be some parcels of land (possibly owned by GBC), which we will wish to review with the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/15170  **Respondent:** 8672993 / Kes Heffer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

My comments under Policy H1 are also pertinent here. This policy is too weak to be effective in increasing the availability of affordable homes. 40% is insufficient as a percentage for the numbers of affordable homes in a development; it should be at least 80%. (This percentage has even declined since the 2014 version of the draft Local Plan, in which it was set at 40-45%). Nor should there be a lower limit of 5 houses or minimum area criterion for the developments that are affected by this policy. No new housing off the campus of Guildford University should be provided for its students; sufficient planning provision was made in earlier years to cater for student housing on the Manor Farm site, which the University has failed to develop for that purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/15200  **Respondent:** 8672993 / Kes Heffer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/1539  **Respondent:** 8687041 / Michael Aaronson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( No ), **is Legally Compliant?** ( )
I OBJECT, because I do not believe that these homes will be affordable to the people who need them. Allowing developers to include properties that will be sold at 80% of market rate is not an adequate response to the shortage of housing for first time buyers and people on low incomes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT TO POLICY H2 (AFFORDABLE HOMES): • Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development. • The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation. • Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas. • This policy won’t affect
market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11497  Respondent: 8706625 / Hilary Barker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am in favour of “affordable homes” being built BUT only for our own local families and key workers who already live in Guildford on a low income and cannot afford to get on the housing ladder – not those choosing to migrate from London.

By stating in the Plan that affordable homes will be provided “subject to viability” this creates an escape route for developers and it is financially more “viable” for them to build executive homes only. It should be taken out of the Local Plan.

There should be more plans to build affordable homes in the town centre for our key workers – hospital staff, teachers, firemen, police etc. They are the most important people and we should look after them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15  Respondent: 8707553 / Stuart Farquharson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. You state that the purpose of the building more houses is to provide affordable housing - how on earth does GBC believe that allowing the Greenbelt to be developed on is going to suddenly lower land values here….have you all been smoking something funny? An average house in Horsley costs around £700K - An affordable house is deemed to be 80% of the total cost of the average house in that area currently making an affordable house in Horsley to be priced at well over half a million pounds - how many key workers can currently afford that cost?? Are GBC and the developers suddenly going to offset the costs to help people to get onto the property land…that would be a big fat NO!.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4506  Respondent: 8709249 / Geoff Spink  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

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In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4720  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

- Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17068  Respondent: 8717921 / Helen Jefferies  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the lack of consideration of parking issues in local villages caused by larger population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11627  Respondent: 8721857 / Andrea Lightfoot  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The viability clause (4.2.40) means that in practice the policy would not work. Private financial viability has no place in a public policy and should be removed. Loosing countryside for no local benefit.

Building more homes in Guildford cannot increase real affordability given the London market and the average price of houses in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9052  Respondent: 8723809 / Sally Blake  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY H2 – Affordable homes

- Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3234  Respondent: 8726529 / Eric Palmer  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H2
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16903  Respondent: 8728865 / Neville Bryan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Object
How is 80% of market price in anyway “affordable”?
We need more land allocated for social housing – council need to find a way.
This policy regards traveller’s needs to be in line with the Traveller Guidelines issues and included in the NPPF in August 2015.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2046  Respondent: 8729217 / Karen Stevens  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Affordable homes
I object to the changes in policy H2. This policy has been weakened by changing the wording of the policy from “At least 40 per cent of the homes on these sites must be as affordable homes” to “We will seek at least 40 per cent of the homes on these sites as affordable homes.” Simply “seeking” to achieve 40 per cent affordable homes, is not the same as making this provision a “must”.

The aspiration for London is that 50% of all new homes should be affordable within the next 10 years and lower land values should make this target achievable in Guildford now. I therefore believe that the target should be increased from 40% to 50%.

Viability
I also object to the “viability clause” and specifically the deletion in paragraph 4.2.40 of the statement that “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [which would make a scheme unviable to deliver].” This undermines any requirement placed on a developer to provide 40% affordable housing or to fund vital infrastructure on which developments may depend. This could leave the Council exposed to unforeseen infrastructure costs, with the risk that housing developments are progressed without the required infrastructure to support them.

[Figure 4] – “To Let” signs along Southway, Guildford (Image: Grahame Larter). Around 7000 students occupy private homes in the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  KJS 2017 consultation response (rev 01F).pdf (7.6 MB)
Land North of Guildford, West Horsley for example is more expensive and property developers will not build ‘affordable homes’ but expensive executive homes to sell at premium prices. We would be losing valuable countryside for no local benefit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6708  **Respondent:** 8731649 / Ian Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/122  **Respondent:** 8731649 / Ian Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.
The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “*In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].*” That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13931  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY H2**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15820  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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Page 26 of 322
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4448  Respondent: 8734241 / Andrew Ingham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am not against controlled and reasonable sustainable development in local villages as a means of providing good quality affordable housing in response to demand, but it has to be in keeping with the surrounding environment and existing population density. Future development proposals should be dealt with on a case by case basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12959  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy H2 Affordable Homes

In the absence of a national plan to redistribute growth away from London I doubt whether the proposed homes can remain affordable, or will be built where needed, for those who are genuinely in need. GBC has not taken account of the differences in need for low cost housing across the Borough. A significant amount of low cost housing is likely to be built where it is not required. In East Horsley this is likely to result in their quick resale for profit and then being unaffordable to low income workers. We would be losing countryside for no social benefit. I object to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY H2

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In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/5591  **Respondent:** 8771265 / H C MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17031  **Respondent:** 8787969 / K Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/104</th>
<th>Respondent: 8792193 / Brian Wolfe</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Housing

Policy H2 Affordable Homes

2.1. Whilst I support the principle that developers and landowners should be required to contribute part of their profit or windfall towards the cost of social housing in the borough. However, there is a ‘one-size-fits-all’ policy that is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term. As mentioned above the DCLG advice to those assessing need was to not just consider need in the old way (“it is not an old style needs survey”) formed part of the advice given. It asked for the survey to take in viability, deliverability of both market and affordable homes. GBC commissioned a study on affordable housing needs and viability the study undertaken by consultants who had access to a stakeholder's panel of mainly those with a vested interest in some of the outcomes. It is hardly surprising it did not come up with the best results as a there would have been too much influence from the development lobby lead to the following mix for affordable housing and a level of 40% on all developments. This does not mean that affordable homes have to be built on every site but that a contribution towards affordable homes has to be provided on every site. They can be built elsewhere a route taken by many local authorities who see it as an opportunity to build homes where they are most needed.

2.2. The Local Plan also indicates that 40% of all new affordable homes should be 1 bedroom. Now if the same question is put to those seeking affordable homes only 26% are looking for 1 bed. The information taken from Home Choice indicates what the customer wants. Between 46% & 50% say they want 2 bed accommodation. The information contained in the local plan is what the developer wants to deliver

<table>
<thead>
<tr>
<th>No of bedrooms</th>
<th>Local Plan</th>
<th>Home Choice data mix bidding information</th>
<th>most recent bidding information</th>
<th>Home Choice data mix taken as the historic level of bidding</th>
</tr>
</thead>
</table>
2.3. Whilst the consultants who undertook the SHMA and the Viability Study were given access to GBC waiting list it is not known by senior housing management staff if this information was taken into account in the conclusion reached. It has subsequently been confirmed by GBC own Housing Management that 2bed accommodation is the one most needed. So why does the plan say more 1 bed are required are GBC happy to allow the developer to determine the mix?

2.4. Also in this policy GBC have taken no account whatsoever of the differences in affordable housing need across the borough. It is to be applied at 40% in all locations, ok to get the money for 40% but why build them where they are not required. This policy and it inflexibility has significant consequences in East Horsley, whilst scoring high in the sustainability hierarchy is the area with the lowest demand for affordable housing in the borough. I support the building of a few affordable homes in East Horsley and other rural areas, however, East Horsley is not protected as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the right to acquire or enfranchise entitlement. In other words tenants can acquire, (buy) or enfranchise any affordable properties built in the village– a factor which may limit the number of housing associations wishing to take on new affordable properties in our village. Housing Association whose tenants do exercise the right to buy their housing association property this will be funded by GBC having to selling off some of its own more expensive properties. This sounds like a loose - loose rather than a win - win situation if cash payment in lieu are maximised and land is bought and homes were built in areas where they are most needed. A large number of GBC own properties in East Horsley have already been bought by tenants.

2.5. Under Policy H2, 40% of all but the smallest development sites less than 10 units in East Horsley will be required to have affordable housing built upon them, irrespective of whether they are in an appropriate location and irrespective of whether there is actually a demand for more social housing in that area. As a result of this policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location. Research undertaken at Oxford University has indicated that people who are housed in remote rural communities migrate back to urban areas for recreation and work. This involves the increased reliance on a motor vehicle and increase traffic results something the NPPF rejects as unacceptable.

2.6. Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious ineffective in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a buying-up of properties for investment purposes, quick re-sale or to re let at market rent all of which point to these homes become lost to the affordable market sector.

2.7. There is a problem in East Horsley with average house prices exceeding £1m a shortage of smaller homes and I would support any policy that would prevent any new development containing 5 bed homes with developers encouraged to build more 2&3 bed market homes for young families and downsizers, the latter currently house blocking many 4, 5, 6 bed homes which they no longer need.

2.8. I therefore OBJECT to policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy H2: Affordable homes

- The policy states that GBC will seek affordable on sites providing five or more homes or on sites of 0.17 ha or more, regardless of the number of homes. GBC will seek at least 40 per cent of the homes as affordable homes.
- **I object to the above policy**
- **justification**

- The government following a high court ruling in their favour have changed the threshold from 5 or more to more than 10 homes before the 40% provision of affordable is required.
- GBC insistence of using the 5 or more figure are reducing the viability of small developments and therefore preventing or delaying the development of housing on small site.
- Many sites contained in the SLAA in Guildford urban areas did not make it through LAA or to the plan because they were regarded as unviable because of the 5 unit rule. Many of the sites were assessed as only suitable for houses, when flats would have been more appropriate. This was a deliberate attempt to reduce the number of viable site in Guildford urban areas for inclusion within the plan.
- Affordable housing at the level suggested built in East Horsley would soon be lost to the market by right to buy or enfranchise. It would be more appropriate to seek payment in lieu.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16567  Respondent: 8795329 / Nicholas Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Brownfield land available. The is enough brownfield land in the town centre to meet real needs for affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1438  Respondent: 8795553 / Robert Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2: I OBJECT to this policy. It is seriously flawed since it fails to take into account the differences in the need for affordable housing across different parts of the Borough. GBC's 'one-size-fits-all' solution will merely see the wrong kind of affordable homes being built in the wrong areas and used to house the wrong people. GBC should totally re-think this policy which as it stands will lead to wholesale inefficiencies in the supply of social housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/696  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also have concerns over the changes in funding in policies SRN2 and SRN3. While I strongly welcome developer ‘funded’ (which implies more financial commitment than ‘contribution’) for road network improvements which are required as a direct result of new housing, I am concerned this may lead to a reduction of the affordable housing percentage delivered (which should be 40% in most cases). This concern is in part due to a change in Section 4.2.40, where there is in my view some softening of the language around the issue of developers needing to demonstrate lack of economic viability of affordable homes in order to reduce their standard quota (40%). This concern applies to other developer funded projects including Wisley cycle networks.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/1475</th>
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<tr>
<td>I object to the suggestion of the provision of affordable houses. I very much doubt if any of the houses/flats to be built will actually be affordable for young key workers. This is used a great deal as the justification for building so many in the first place.</td>
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<td>I would suggest that the Local Plan will have the effect of drawing in many new people to the area whilst leaving existing residents still unable to afford housing of their own.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>I object to the change in policy on affordable homes – Policy 4.2.23 – whilst the first plan demands that “Developers will be expected to provide land for affordable homes at nil value,” the 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” This means that the developer no longer has to provide any ‘affordable’ homes but has to make a payment to the council. So whilst the housing that we need must be affordable, it is unlikely that this development will result in many affordable homes at all.</td>
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<th>Respondent: 8797665 / Sylvia Lillywhite</th>
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<tr>
<td>H2 I see no efficiency of the plan for affordable housing in East Horsley, we all know it will not happen there will be more 4/6 bedroom houses not affordable ones. Already they are knocking 2 bed cottages down for the Large house to occupy a space. Where do older people go when the large house goes? not in this village. Planning is wrong already, the future is unknown.</td>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2353  **Respondent:** 8806305 / Laurence Cook  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )**

**POLICY H2 – Affordable homes**

I OBJECT. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value.
Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that
these homes will remain well beyond most people’s means and that starter homes will not become available for local
people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial
viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will
sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration)
to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging
labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-
building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will
stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined
by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost
of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a
more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally.

Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13776  **Respondent:** 8806849 / Roland McKinney  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )**

**Policy H2: Affordable Homes**

I OBJECT to this policy.

**Summary**

This policy is predicated on the premise that housing supply in the borough has not kept pace with demand, so
consequently house prices have soared. This premise is incorrect; analysis using census data shows that in the period between 2001 to 2011, housing supply was greater than demand, yet during this period average house prices almost doubled. Factors other than the balance between supply and demand were clearly the cause of increased prices.

The policy also assumes that the affordability of housing in Guildford is worse than in other areas of Surrey, and used data from 2013 to show this. More recent data is available (despite the wording in the policy saying it was not) and this more recent data shows that housing in Guildford is more affordable than in all neighbouring local authorities that share a boundary with the borough, except for Rushmoor. When compared to London, affordability is much better in Guildford.

So this policy is based on incorrect assumption and presents erroneous information to justify those assumptions. The discussion below illustrates these errors.

Discussion

In the draft Local Plan affordable homes is a misnomer, a designation that could have come straight from George Orwell’s Ministry of Truth. It refers to houses that are expected to go onto the market at 20% below the “market” price, or available at a rent of 80% of the prevailing “market” rate. Some of these are built to lower specifications than neighbouring houses, so that they remain profitable for builders. But when house prices and rents are high, so-called affordable homes are not affordable to those with low paid jobs or on benefits. “Affordable” homes are not the same as social housing, or old style council housing, and are not a replacement for any social housing that is sold off. Across the borough, according to the most recent data from the ONS, in Feb 2016, there were 5,696 housing benefit claimants. These “affordable” homes will be of no use to these people, or others on benefits, or on low wages. There is nothing in this policy for these people, many of whom need social housing, which historically has been truly affordable.

The Policy Statement (blue text in the Strategy and Sites document) refers to working “to increase the number of affordable homes in the borough and meeting identified needs.” But there is nothing in this plan that will meet the needs of those on benefits, or on low wages.

The Policy goes on to say that on sites “providing five or more homes, or sites of 0.17 ha regardless of the number of homes, at least 40% of the homes must be affordable homes….” A site of 0.17 ha is only 0.4 acre, and many single homes are built on plots of this size. This is a very low threshold. No exemptions are given – for example, what about self-build housing, or shared ownership, etc? This policy does nothing to encourage various paths to property ownership, other than the affordable housing route – which for many people is simply not an option. It is poorly thought out and is based on data which is not accurate, including the West Surrey SHMA, which in any case should be revised because of the poor understanding of the borough’s population statistics that underpin the study and the Brexit vote.

In the wording of the text supporting this Policy there are many errors of fact, errors through omission and exaggerations in the introductory text to this policy. As an affordable homes policy should be a cornerstone of the Local Plan, some of these are reviewed in depth below.

Paragraph 4.2.30

The final sentence of this paragraph reads: “High demand and limited supply have resulted in one of the least affordable areas of the country to live in”.

This is a profound statement, but one that was made without any supporting analysis, so it appears to be based on supposition, not on fact. Relevant analysis would consist of looking at demand for housing through, for example, population growth; then at the supply of new homes and the balance between these – and then compare this with property price increases. Then a similar analysis should examine other areas too, to assess if Guildford Borough is different from other local authorities within the south east. Obviously, this type of detailed analysis is not possible in a submission on the draft Local Plan, but the fact that this statement was made in paragraph 4.2.30 without any supporting information is a major concern, as this unsupported statement in itself could be considered to be the driver for housing policies within this draft Local Plan.

There is no question that property prices are high within the borough, but this is largely a consequence of being close to London, with a reasonably fast train connection. A Local Plan is supposed to focus on local needs, not the needs of those who wish to move out from London. All of Surrey and the home counties have high prices and recent statistics show that the rate of price increases in the East has been higher than in the South East. High prices are not a phenomenon unique to Guildford. This is shown in Figure 1, which shows that price increases in Guildford are mirrored in Woking and Dorking,
which are in neighbouring boroughs. In fact, this shows that over the last two years price increases in Dorking have been higher than in Guildford. This figure was generated on the Zoopla website.

It is also incorrect to suggest that high prices are a consequence of an imbalance between supply and demand – there are many factors that have an impact on property prices; the supply and demand balance is only one of these. Although it is not appropriate to have a detailed critique of why housing costs are high, as one of the declared goals of the Local Plan is to increase affordability it is appropriate to comment on other factors that affect house prices, and this has been done in Annex 1. This also provides a borough wide analysis of the supply of housing between 2001 and 2011 and the demand for new housing, using census data.

This shows that the population of the borough increased by 7,482 persons, of whom 3,723 were full time students aged 18 and over. A few of these may have been Guildford residents but the vast majority would be new to the area. Some students find accommodation in student halls, and as this accommodation expanded during this time period, it has been assumed about 40% of the increase in student population would find accommodation in student halls, leaving 2,234 that would need accommodation in the town. With 4 students per house, this need would be equivalent to 559 houses.

Census data for 2011 revealed that the average household in the borough was 2.42 persons, so the increase in demand for housing caused by the increase in population (excluding students), assuming 2.42 persons/household, was 1,553 new houses.

Thus the total number of new dwellings required by Guildford’s population increase between 2001 and 2011 was 2,112 (559 plus 1,553). In fact, the census reveals that the number of new dwellings was 2,692 – so supply actually exceeded demand by a considerable margin, about 28%. Yet over this period Land Registry data shows the average house price in Guildford borough almost doubled. As supply exceeded demand, other factors beyond the supply and demand balance affected house prices. This means that the underlying premise behind the Local Plan is incorrect; house prices have not increased because of a supply/demand imbalance. At the very least this means that the 31 houses added to the housing target to promote affordability should not be included, but in fact the whole of the SHMA and Local Plan should be revised, to include a more accurate picture of the housing market, especially to examine the implications of Brexit.

However, there has been no detailed analysis by GBC of housing needs, this was contracted out to a consultant, and the housing model used by that consultant has not been subject to any scrutiny. The SHMA did not examine fundamental reasons for house price increases, nor did it properly examine the historic supply and demand balance across the area. Consequently, the SHMA is not fit for purpose, as no understanding of the fundamental workings of the housing market was shown in this study. Had a proper analysis been carried out it would have shown that in 2015/6 across the borough there were 2,510 housing transactions, and analysed the price bands of sales. Of these, 713 housing transactions were below £300,000, which is approximately what a couple on average earnings in the borough could borrow. A more detailed breakdown is given in Annexe 1.

Paragraph 4.2.31

In paragraph 4.2.31, the text of the opening sentence reads “The West Surrey Strategic Market Assessment 2015 indicates that approximately half of the Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy.”

This sentence is plainly nonsense. The census data of 2011 showed that 66.6% of Guildford households either already owned or were in the process of buying their home. If the sentence refers to new households being formed in Guildford during the plan period, it should say so. If that were the case, it would not be surprising – the statistics on which the housing projections were based included a large increase in the number of full time students, a fact which was ultimately overlooked by GBC consultants, despite this being noted in several places in the SHMA. As shown in Annexe 1, census data shows 50% of the increase in population from 2001 to 2011 were students – and very few of these would be seeking to buy in Guildford, but are unlikely to take up a place at the university unless they had adequate funding, including the means to pay their rent.

Paragraph 4.2.32

Paragraph 4.2.32 discusses affordability in more depth and provides the ratio used by GBC to assess affordability. There are many definitions of affordability in use by different organisations and frequently this is a ratio between pay and house
prices. GBC have decided to use a ratio which is of very limited value – the ratio of the lowest 25% of earnings to the lowest 25% of house prices. The higher this ratio, the less affordable the housing. This is a remarkable ratio as at the peak of home ownership in the UK, home ownership was just over 70% of total households. This is not because the remaining 30% did not want to own a house, although some did, but because in many cases home ownership was not a suitable option. This would apply to students, to migrant workers who wish only to work in the UK for a short time; people who do not want the responsibilities that comes with home ownership; people with temporary employment contracts, armed forces personnel, etc. etc. But GBC have chosen to consider affordability using the lowest paid – a group that have never been able to afford home ownership, or who may have no desire for home ownership. It is a bizarre ratio to use and is completely inappropriate to assess affordability in the borough.

It is more normal to consider the ratio between average pay and average property prices, though this is not an especially good ratio either, as average pay gives a certain weight to the lowest paid, who have never been able to afford home ownership. Average house prices are not a good measure either, as the sales of a few high cost properties will tend to push up average prices and distort the affordability ratio. It is much better to use the median property price in an affordability ratio. Another more relevant ratio is to use the average pay of first time buyers and the median price of properties purchased.

The text in the paragraph goes on to use government figures from 2013, quoting GBCs affordability ratio (bottom 25% of wages to bottom 25% of house prices) of 10.92 which was said to be “higher than Surrey’s ratio of 10.89”.

The difference between these two ratios was 0.03, or in percentage terms, 0.28%. In others words, given that affordability ratios are estimates, there is no significant difference between these numbers. So it was nonsense to infer that property in the borough was less affordable in 2013 than in the rest of Surrey.

The text also states that the most recent data for this affordability ratio is from 2013, but in fact up to date information is provided by way of an interactive map2 which shows that Guildford Borough has a better affordability ratio than all but one of its neighbouring boroughs. In other words, housing is more affordable in Guildford than in most neighbouring boroughs. Data provided by the ONS was from Q3 2014 to Q3 2015, as full details for 2015 were not available. This map (and a supporting spreadsheet) provides 2 ratios, for median earnings to median house prices and GBC’s preferred measure, lower quartile earnings to lower quartile house prices. These are given inFigure 1, and on GBC’s preferred lower quartile measure, Guildford is the most affordable of 6 of the 7 authorities listed, with only Rushmoor more affordable. On the more appropriate ratio of median pay to median property prices Guildford and Surrey Heath were essentially the same, with only Rushmoor again more affordable.

2 See https://communities.maps.arcgis.com/apps/MapSeries/index.html?appid=92675dad41214a52afcdb1e9f7e71783

Table 1 Affordability Ratio Comparisons

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Lower Quartile Ratio</th>
<th>Median Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elmbridge</td>
<td>14.19</td>
<td>15.17</td>
</tr>
<tr>
<td>Woking</td>
<td>13.95</td>
<td>13.31</td>
</tr>
<tr>
<td>Waverly</td>
<td>13.37</td>
<td>14.67</td>
</tr>
<tr>
<td>Mole Valley</td>
<td>12.63</td>
<td>12.98</td>
</tr>
</tbody>
</table>
This data shows clearly that GBC were incorrect to say that up to date affordability data was not available and more importantly, that of the local authorities that share a boundary with Guildford Borough, housing in Guildford Borough is actually more affordable than in almost all neighbouring local authorities.

Another indication of Guildford’s relative affordability was provided by an article in the Daily Telegraph3 This was about a couple who had been resident in London, but had moved to Guildford so that they could save for a deposit, but who were considering a move back to London. A comparison was made of the costs of living in Guildford or London, including travel costs to work in London, which showed that annual costs in Guildford were lower by an estimated £3,052; about 16% cheaper living in Guildford than in London. This is why people are moving from London to Guildford – and is why if houses were built as per the Local Plan target, they would mostly be bought or rented by Londoners, not by residents of the borough.

Paragraph 4.2.23

This paragraph refers to sufficient housing to meet the needs of the borough’s population – but the proposed minimum of 693 dwellings a year is well in excess of the needs of the borough’s residents. The data used in the SHMA ignored the effect of full time students and so the housing number is very considerably in excess of the needs of the resident population. If this housing is delivered it will cause an increase in Guildford’s population that is considerably more than recent population growth – almost 5 times the rate of population growth during the period between the censuses of 2001 and 2011.

The final part of the paragraph is nonsense

“…..ensuring people with a wide variety of occupations in the borough and potentially reducing travel to work journeys.”

3 Daily Telegraph “Helping young renters get on the ladder” June 14, 2016

Housing proposed in the Local Plan is mostly in the countryside, with about 70% of the housing proposed on land that is currently in the Green Belt. These locations are some considerable distance from employment centres, many of which are located in central Guildford – so journeys to work will increase, not reduce, and congestion will get much worse. This issue is considered in detail in Annexe 2, which shows clearly that building new homes in the countryside will result in many more traffic movements than building homes within the urban areas of Guildford town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Doc1.doc (555 KB)
Annexe 1
Housing Supply and Demand Balance Analysis in Guildford Borough: 2001 to 2011

As census data is considered by the Office for National Statistics (ONS) to be their “gold standard” this analysis uses only census data. Although data for subsequent years is available, this is based on many estimates and so analysis is more subjective.

Across the borough, during the 10 year period between the two most recent censuses, the number of dwellings in the borough increased by 2,692, an average of 269 dwellings per year. During the same period, the population of the borough increased by 7,482 persons, but a high percentage of these were full time students, aged 18 and over. Some of these students may have been local, but as this was probably a small number, it was ignored. This data is summarised in Table 2, below.

Table 2 Census Data for Guildford Borough

<table>
<thead>
<tr>
<th></th>
<th>2001</th>
<th>2011</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings</td>
<td>53,388</td>
<td>56,080</td>
<td>2,692</td>
</tr>
<tr>
<td>Population</td>
<td>129,701</td>
<td>137,183</td>
<td>7,482</td>
</tr>
<tr>
<td>Students (18+)</td>
<td>7,004</td>
<td>10,727</td>
<td>3,723</td>
</tr>
<tr>
<td>Persons/household</td>
<td>2.32</td>
<td>2.42</td>
<td>0.10</td>
</tr>
</tbody>
</table>

Some of the increase in students would have found accommodation in students halls of residence (for example, the development in Manor Park opened in 2005) it is assumed that about 40% of the increase in student numbers were in student halls of residence, leaving 2,234 to find accommodation elsewhere. The majority of these would have found rooms in privately rented houses, categorised as “Homes of Multiple Occupation”. Assuming 4 students per house, the increase in student numbers would have needed 559 extra houses. The remainder of the population increase, the “permanent” resident population of Guildford, increased by 3,759 people. As the average number of people per household was 2.42 in 2011, a further 1,553 dwellings were needed for this increase in population. So to house the overall increase in population, including students, about 2,112 additional houses were needed – but 2,692 were built. Thus the number of houses needed in Guildford to house the population increase was actually substantially lower than the supply available; so the balance between supply and demand was not responsible for the increase in house prices over this period, when average property transaction prices across the borough almost doubled.

During the financial years 2001 to 2011, average property transaction prices across the borough are shown in Table 3. This includes average and median property prices for transactions in the years shown. In any given year there may be several high priced transactions which distort an average, and so the median price is also given – the median is the mid-range price, so that 50% of transactions were below this price with 50% above. It is a better indicator of the movement of prices than averages. Also shown is the number of transactions for each year.

Table 3 Land Registry Property Prices in Guildford Borough

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Price £</th>
<th>Median price £</th>
<th>Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001/2</td>
<td>218,637</td>
<td>172,000</td>
<td>3118</td>
</tr>
</tbody>
</table>
The data in Table 3 shows that prices increased very rapidly from 2001/2 to 2007/8, and that the number of transactions was quite constant, at about 3,050±200. This represented a turnover of about 5.6% of all of the dwellings in the borough (53,388 in the 2001 census). Then in 2008/9, prices fell, and stayed low for two years. If the balance between supply and demand were the only factor influencing house prices this would suggest a huge increase in supply – but this did not occur. It can be seen from this that the balance between supply and demand must have had a minor impact on house prices. In fact, determining factors were the availability and cost of credit, and the demand for housing outside London. Credit was freely available and credit costs (in real terms) were low, consequently house prices increased rapidly from 2001/2 to 2007/8.

Data from Table 3 is shown in graphical form in Figure 2, and the impact of the recession of 2008/9 is clear. It interrupted the increase in property prices – but the reduction in interest rates that accompanied this recession, which provided very low credit costs, resulted in property prices increasing again in 2010/11. Credit costs continue to be very low and when combined with the huge expansion in credit from quantitative easing, the price of fixed assets, including housing, increased sharply. Again, this had little, if anything, to do with the supply and demand balance for housing. This picture of supply of housing exceeding demand across the borough is similar to the national picture. According to an article in the Guardian newspaper,6 across the nation between the years of 1997 and 2007, “the housing stock grew by 10%, but the population only grew by 5%. If house prices were a function of supply and demand, they should have fallen slightly over this period. They didn’t. They rose by more than 300%.” So the issue of high prices is a national issue, not confined to Guildford Borough, and is not solely because of the supply and demand balance. Building more houses to increase affordability within the borough will not have the desired effect. This conclusion (based on data) is at variance with the Local Plan, and shows clearly that the evidence base underpinning the Local Plan is suspect, and that the analysis in much of this data base, especially the West Surrey SHMA, is

<table>
<thead>
<tr>
<th>Year</th>
<th>Transactions</th>
<th>Property Sales</th>
<th>Price Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>2002/3</td>
<td>254,406</td>
<td>199,995</td>
<td>3211</td>
</tr>
<tr>
<td>2003/4</td>
<td>275,070</td>
<td>220,000</td>
<td>3036</td>
</tr>
<tr>
<td>2004/5</td>
<td>294,235</td>
<td>240,000</td>
<td>2851</td>
</tr>
<tr>
<td>2005/6</td>
<td>303,612</td>
<td>246,250</td>
<td>2974</td>
</tr>
<tr>
<td>2006/7</td>
<td>336,925</td>
<td>250,000</td>
<td>3294</td>
</tr>
<tr>
<td>2007/8</td>
<td>381,221</td>
<td>289,950</td>
<td>2867</td>
</tr>
<tr>
<td>2008/9</td>
<td>354,322</td>
<td>250,000</td>
<td>1481</td>
</tr>
<tr>
<td>2009/10</td>
<td>354,198</td>
<td>270,000</td>
<td>2127</td>
</tr>
<tr>
<td>2010/11</td>
<td>414,167</td>
<td>303,000</td>
<td>1916</td>
</tr>
<tr>
<td>2015/16</td>
<td>486,158</td>
<td>391,750</td>
<td>2510</td>
</tr>
</tbody>
</table>
inadequate.
The cursory analysis above also indicates the severe impact of having an additional 693 dwellings coming onto the housing market. At the beginning of the recession, in 2008/9, there were only 1,481 property transactions across the borough. Adding 693 dwellings to this would create many problems for any existing householders who wished to sell. As new build housing would be attractive to anyone moving from London, and is more expensive than equivalent “used” housing, the average price for housing would probably not fall – but householders would be forced to reduce their selling price in order to sell.

Given that the number of domestic property transactions in 2015/16 was 2,510, adding 693 houses to this mix would mean that redevelopment projects would not proceed. Existing run down areas of Guildford would become more run down – there would be no incentive to revitalise them under this proposed plan. Green field sites outside Guildford would provide the bulk of new dwellings – so large areas of Guildford would simply be left to decay. This is contrary to policies within the NPPF, specifically those policies that protect the Green Belt.

Figure 2 also shows that the median price is increasing more slowly than the average price, a clear illustration that the average price is not a good indicator of the housing market, due to the impact of a limited number of high value transactions.

Figure 2 Property Transaction Prices in Guildford Borough

A true picture of the housing market has not been presented in this Local Plan. A more accurate picture (for 2015/16) is given in Table 4, which shows, for example, that there were 183 housing transactions at a price equal to or lower than £200,000 during 2015/16.

Table 4 Housing Transactions in Guildford Borough, 2015/16

<table>
<thead>
<tr>
<th>Number of Transactions</th>
<th>Average of these</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>≤£100,000</td>
</tr>
<tr>
<td>183</td>
<td>≤£200,000</td>
</tr>
<tr>
<td>713</td>
<td>≤£300,000</td>
</tr>
<tr>
<td>1312</td>
<td>≤£400,000</td>
</tr>
</tbody>
</table>

According to other ONS statistics, average earnings for Guildford residents in 2015 was £33,557 per year. A couple, with both on average earnings, using a multiple of 4.5 times earnings, could take out a mortgage for just over £300,000. According to the 2015/16 Land Registry data they would have had a choice during 2015/16 of at least 713 properties. This suggests that the affordability issue in Guildford has been exaggerated in order to promote a pro-development agenda.

Factors that Affect House Prices and Affordability

Across the UK, much of the planned increase in house building is related to the issues of high house prices and affordability – building more houses to increase the supply has been the approach adopted by the government, even though this policy is high risk, for example, consider the collapse of the housing markets in Spain, Ireland, etc in 2008/9 as a consequence of their massive house building programmes. There has been no risk analysis associated with the policy, either nationally or locally in the borough. House building appears to have been put in place as a strategy to drive economic growth, so that a great deal of effort (and government subsidy) has been devoted to this policy, to the detriment
Affordability is not just a question of increasing housing supply, it is much more complex and a proper analysis should examine associated questions such as: why have real wages in the UK increased so slowly? Slow growth in wages means that house prices have outstripped the growth in real wages, and so affordability ratios have fallen. A sound, sustainable economy will not be built by housebuilding alone and to pursue this path is to embark on a policy that could well end in ignominious failure, with a housing bust similar in scale to that experienced in Spain and Ireland. But what other factors are important in determining house prices and affordability?

When considering this issue of affordability, and the approach of building more dwellings, there is an implicit assumption that the only determinant of house prices is the balance between supply and demand. But this is a nonsensical assumption. In 2008, when house prices in many regions of the UK (and across the world) started to crash, this was not because of a sudden massive increase in supply. Many other factors were clearly at work. Other factors that are important in determining house prices include:

- **The cost of credit** – the interest rate: effectively this is set by government policy via the Treasury and then by the Bank of England. This has been extremely low for 5 years, and is set to remain low for the foreseeable future. Even before the reduction in the Bank of England rate to 0.5%, the real cost of credit had been low for many years – largely because the governments preferred measure of inflation, the CPI, does not include a measure of housing costs. The current very low cost of credit means that mortgage payments as a percentage of take home pay are lower for first time buyers than during previous property booms of 2005-7 and 1989-90. House prices are set by what people can afford to pay, and so property prices have climbed.

- **The availability of credit.** At the very least this is regulated by government, but in practice it is effectively set by government policy, for example, quantitative easing has resulted in huge credit expansion leading to asset price inflation, including house price inflation. Current high house prices are a direct consequence of the economic policies of successive governments, spanning a period of at least 20 years.

- **Various schemes to assist buyers such as “Help to Buy”** have enabled house builders to increase or maintain prices, so that much of the subsidies government pays ends up as builders profits. This is because, for example, equity loans are available only on new build properties.

- **Housing subsidies paid by the government.** In 2015, about £24 billion was paid out as housing benefit, of which about £8.8 billion was paid to private landlords. Consequently, housing benefit has largely driven the buy to let boom. With a secure rental income, buy to let landlords can bid up the price of houses, beyond the reach of other buyers.

- **The growth of “buy to leave”,** which is driven largely by money from overseas, some of which comes from the black economy and illegal activities in overseas countries. Overseas buyers effectively use a house in the UK (predominantly London and its environs) as a safe deposit box in the sky. This has led to a significant number of properties in London being sold to overseas buyers, who have no intention of living there – but their investment is safe and likely to appreciate in value. In the years 2014 and 2015, Asian buyers alone paid $24 billion for UK property, of which $20 billion was in London. This forces London residents to move out to the suburbs and beyond, pushing up prices across the whole of the south east. Brexit and associated financial instability is likely to have an impact on this, and it may create a downturn in the London housing market.

- **Taxes** – not just stamp duty but other taxes contribute to the high final cost of a house. Taxes and levies on the extraction of raw materials from quarrying coupled with high landfill taxes increase the final cost of every house built, so that stamp duty is just another layer of tax – the icing on the taxation cake for government. What extraction taxes and energy policies have done is force the closure of British brick plants, cement makers, etc, etc. Now that there is a construction boom, building materials are being imported from all over Europe – bricks from Germany and further afield, roof tiles from Belgium, cement from France, etc. This leads to large increases in prices when there is an increase in construction – over the 5 years to 2016 brick prices increased by 25%, cement by 17%. The living wage will increase the pay of unskilled workers, such as labourers. Even in the recent past, a construction boom was a major stimulus for the British economy, but this is no longer the case because so much building material (and workers) are now imported. In 2015, the value of total imports of building materials from EU countries was £4.9 billion.

In addition, the Landfill Tax ensures that land is not used efficiently – it is cheaper to build large surface area car parks than to excavate and build car parks underground so that even when multi-level car parks are built, they generally have no basement – because of the high cost of excavation due to high landfill taxes. Guildford town is a classic example of inefficient land use, with large surface car parks at the university; park and ride car parks, at the railway station, and at employers throughout the town. This is a grossly inefficient use of land, but this inefficient land use is a consequence of government policy.
• Profit margins of developers, which are currently somewhere between 20 to 30% on the cost of a house, even after high, exorbitant salaries are extracted from the companies for company executives. As an example, Berkeley Homes has in place the most generous bonus system ever put in place by a British company, with £1 billion due to be distributed to company executives if certain targets are met – and the company is en route to meet these targets, mainly because of its ability to set and maintain high house prices. The chairman of Berkeley Homes was one of the highest paid persons in the UK in 2015, with his benefits amounting to more than £22 million for the year. Profit margins enjoyed by housebuilders would not be tolerated in government regulated industries such as utility companies, or in food retailers, etc. It applies to the most expensive purchase the vast majority of purchasers will ever make, and it shows clearly that the housing market model used by the government (supply by the private sector only) is working only to benefit developers. It is functioning as a free market – but it is not a true free market because of the other factors that determine house prices such as government subsidies, including housing benefit. These create a win:win housing market for developers. The ability of developers to control housing supply is a major problem with the housing market – it is not the planning system that limits the supply of new dwellings, it is developers ensuring that they can maximise their profit margins by drip feeding new builds onto the market. The Local Government Association stated that there are potentially 400,000 dwellings with planning permission but construction had not been started. So the problem is in the operation of the market, not in the planning process. Reforms to the way that the housing market operates are long overdue, for example, through a large social housing programme, managed by a national housing executive.

• Government regional policies also have an impact on house prices. This is evident in the way that property prices have or have not recovered after the property price crash in 2008. Not all regions currently have higher house prices than their 2007 peak values: This is clear evidence of an ineffective regional policy, and shows the publicity around creating a “northern powerhouse” is hyperbole. One strand of an effective regional policy would ensure that a genuine free market was allowed to run its course, so that as building in London and the south east became more difficult and expensive (due to strong planning policies protecting the Green Belt and countryside) development would be pushed to other regions, ensuring these regions grew. Instead, the government seek to make it easier for developers to build in areas with the highest growth, by weakening planning policies, so that development is concentrated in London and the south east, especially in the countryside. The effect of this policy (in reality the lack of an effective regional policy) means that demand for development of all types continues to grow in and around London, so that house prices can be increased and controlled by developers. This increases the wealth gap between the London plus the south east and other regions, and limits employment growth in these areas.

• Immigration has a major role in the supply and demand equation – if the rate of immigration were not so high, the demand for housing would be substantially lower. Migration Watch have estimated that at least 40% of the housing demand is due to immigration, but their estimate was based on a lower number of migrants than the current level of immigration, and does not include the impact of the children of migrants, nor does it include the demand from illegal immigration. Thus the government’s immigration policies have had a major impact on the demand for housing. Immigration also has an impact on pay – it helps keep pay levels low, so that employers are not forced to pay more to help with recruitment. This has an impact on affordability ratios. Although there is a construction boom, with a supposed shortage of skilled workers, pay within the construction industry has not increased as rapidly as it has done in the past. This is because employers can recruit immigrants, who will work for lower rates of pay, for example, 50% of sub-contractors working for Berkeley Homes are from eastern Europe. So not only does this policy have an impact on the supply part of the housing equation, but it also has an impact on the ability to afford housing by keeping pay rates lower than they would otherwise have been. A recent estimate by employers was that pay rates for skilled workers in construction have increased by 6%. Historically, this is a very low increase for pay rates in the middle of a construction boom. If immigration policies change as a consequence of the Brexit vote, the pressure placed on housing supply by immigrants will fall, and this should be reflected in revised housing policies.

Annexe 2
Contribution to Traffic Movements and Air Pollution
The Local Plan proposes building a minimum of 693 houses per year, of which 2,400 (17%) will be built within Guildford. The remainder (83%) will be built in the countryside. This is very much against advice from the Institute for Air Quality Management. Intuitively, it seems likely that this spatial distribution of housing would increase car and van...
journeys with a consequential increase in air pollution that is related primarily to vehicle emissions. This paper examines statistical evidence to assess the impact on vehicle journeys within the borough.

**Spatial Vision**

The spatial “vision” proposed in the Local Plan is the reverse of that recommended by the Institute for Air Quality Management, who said

“The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase road traffic.

This report also suggested that:

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done within the borough. This is despite requests to the council to set up an AQMA following air quality tests that show high pollution levels in at least one village which has high traffic levels.

**Sustainability**

To examine the claim that the draft Local Plan contributes to sustainability several areas could be analysed. One of these is the impact on traffic, to assess the impact of adding additional housing in the countryside rather than in Guildford centre. This can be gauged by comparing the likely impact on car ownership of building housing in a rural location as opposed to an urban area of Guildford. Effingham has been chosen for this, but it could be any of the rural villages in the borough, and the impact of additional housing in this village is compared with additional housing in an urban area, Walnut Tree Close/Station area. This can be done using census details, taken from the Office for National Statistics (ONS) publications, so that availability of cars and vans can be compared as well as methods of travelling to work.

What have traffic levels to do with sustainability?

Traffic is a major contributor to air pollution, and air pollution has a significant effect on health. In April 2014, Public Health England produced a report that reconfirmed the estimate by the Committee on the Medical Effects of Air Pollutants that approximately 29,000 deaths per year in the UK could be caused by pollution from man-made particulate matter. This report estimated that there were 55 deaths per year in the borough attributable to air pollution. Particulates are very small air borne particles and transport is the single largest contributor to particulate pollution.

But air pollution is not limited to air borne particles - it includes many other pollutants, and one group that affects human health, especially that of children, is the gaseous oxides of nitrogen, nitrogen dioxide (NO2) and nitrogen monoxide (NO). When taken together these are usually called NOx. Nationally, almost half of these gases are produced by transport. In a submission to the House of Commons Report “Action on Air Quality” published in November 2014, Dr Ian Mudway of King’s College, London said:

“We have also found effects on infant mortality rates, on pre-term birth and on cognitive performance in children. There is some interesting data emerging on traffic proximity, diesel emissions and traffic potentially autism spectrum disorders… The evidence over the last three or four years that children growing up near traffic in areas with high NO2 and primary particle emissions have stunted and impaired lung development is incredibly strong.”

As well as health aspects, road safety is also important – increased traffic levels means more congestion, more delays, more stress, and inevitably, more accidents.

Areas in London exceed the EU limits for various air-borne pollutants, in particular, NOx. This has been on a scale that will result in the imposition of substantial fines on the UK government – and the UK government has expressed a desire for this to be passed to local government in areas that are out of compliance. Although Guildford Borough has a very limited air pollution monitoring regime they have one station that regularly exceeds limits – that at Wisley. Even though this is very poorly sited (meaning that the actual NOx concentration in this area is considerably higher than that being recorded) it has consistently been above EU limits. Thus the borough’s taxpayers may have to share in the costs of the EU fine.

Since traffic has a major impact on air pollution, and as air pollution has a significant on health, especially that of children, it is an important element in sustainability – so the impact on traffic levels of housing policies should be assessed, in detail, before making claims that housing policies are “sustainable”.

**Detailed Traffic Comparisons**

Levels of car ownership vary substantially, as can be seen from the figure, taken from the data in Table 5. This data is taken from 2011 ONS Census data, as published in the series “Neighbourhood Statistics”.

The average number of cars or vans per household is highest in Effingham, with an average of 1.9 cars or vans per household in Effingham in 2011, compared to an average of 0.93 cars or vans per household in Woodbridge Meadows/Walnut the Station. This suggests that plans for high levels of development in the countryside go against all the ideals of achieving sustainable developments as car and van availability is an indicator of how often those vehicles will be used.

Table 5 Comparison of availability of cars or vans

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2001</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Effingham (Parish)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>1.89</td>
<td>1.75</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>4.7</td>
<td>7.3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2001</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Woodbridge Meadows, Walnut Tree Close and the Station</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>0.93</td>
<td>1.01</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>34.2</td>
<td>30.0</td>
</tr>
</tbody>
</table>

In Effingham, there are very few households that do not have a car or van available, at 4.7% of total households, compared to 34.2% in Woodbridge Meadows, Walnut Tree Close and the Station. Given the limited range of shops and services available in rural villages this should not be surprising. Most residents have to drive to be able to access basic health services, and for all but the most basic of shopping needs, employment opportunities, etc. This shows very clearly that it is very likely that there would be increased traffic on the roads throughout the borough as a consequence of additional housing in the countryside, and that this increase in traffic would be lower if additional housing were built in the centre of Guildford.
Experienced city planners such as Lord Rogers have called for increased density in towns and cities as a way to provide extra housing, provided increased density is accompanied by improved amenities and sensible traffic management plans. This is because of the benefits of increased density – towns and cities work better, with better public transport, better access to services, and a reduction in car journeys. Woodbridge Meadows, Walnut Tree Close and the Station are ideal locations for increased population density – the railway station is within walking distance, as is much of the town centre. This is recognised to a limited extent by the Masterplan prepared for Guildford Borough Council, but does not seem to have been recognised in the 2016 draft Local Plan.

As the 2011 census had details of the methods used to travel to work, it is possible to test if traffic implications are in line with these expectations. Methods of travel to work illustrate differing patterns of car and van use, with the details given in Table 6. In Effingham, only 14% of employed people who travel to work use public transport and almost 75% travel to work by car or van. Only 8% of those who travel to work walk or use a bicycle in Effingham, whereas in the Woodbridge Meadows/Station area the comparable figure is almost 33%.

Differences are illustrated in the figure showing the proportion of people who travel to work using public transport, walk or by bike. Building more houses in the countryside will result in many more car journeys – just to get to work. Many more would also be necessary, for residents to shop, to access financial and health services, etc. This shows clearly that car journeys would be minimised if new housing was concentrated in urban areas of Guildford. Sensible planning should seek to improve the ability to use these modes of transport and the impact on the number of car or van journeys is very clear from the comparisons made here. This type of analysis should be a feature when choosing to claim an option is “sustainable”, but it has not been a feature of the draft Local Plan. Claims made that building housing in rural areas is a sustainable option do not stand up to simple scrutiny, even without the consideration that it is proposed to build housing on the limited resource that is farmland.

Table 6 Comparison of Methods Used to Travel to Work in 2011

<table>
<thead>
<tr>
<th>Travel to Work, 2011</th>
<th>Effingham</th>
<th>Woodbridge Meadows, etc</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of those in employment working from home</td>
<td>10.5</td>
<td>5.2</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by car or van</td>
<td>66.9</td>
<td>34.4</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, by car or van</td>
<td>74.7</td>
<td>36.3</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work on foot or by bike</td>
<td>7.1</td>
<td>30.9</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, on foot or by bike</td>
<td>8.0</td>
<td>32.6</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by public transport</td>
<td>13.9</td>
<td>27.4</td>
</tr>
</tbody>
</table>
Conclusions
The spatial planning in this draft plan will increase traffic movements and consequently, air pollution. Air quality should be a constraint used to limit the housing target. Even with a lower housing target, instead of what is proposed a higher proportion of housing developments should be within Guildford town. This could be achieved by recognising that an expansion in retail and warehousing and distribution within the urban area is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality, with proposals to reduce noxious emissions, for example, through the use of LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 24,000 cars and vans to those already in use within the borough, based on car ownership levels in a rural village and an urban area in Guildford. This is the approximate number of vehicles that the proposed housing additions would bring, thought his number would vary, dependent on where the additional houses are located. If all the proposed housing were within Guildford, then instead of 24,000 about 13,000 cars and vans would be added to the existing total. In the census of 2011, the total across the borough was just under 54,000 cars and vans.

The comparisons made above show that traffic and air quality has not been considered in the spatial allocation of housing. Sustainability claims have not been analysed in drawing up the housing proposals featured in the draft Local Plan. A simple comparison of only one aspect of sustainability, car use (with its associated air pollution), shows very clearly that building extra housing in Effingham (a typical rural area village) is the least sustainable option. As a method of travel to work, car use in Effingham was shown to be much higher than in an urban area of Guildford, so to limit increases in traffic and emissions from traffic, housing should be provided in areas closer to employment opportunities and with access to good public transport. This does not mean that no additional housing should be provided in the countryside, but this housing should be limited in quantity, in keeping with its Green Belt status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5280</th>
<th>Respondent: 8810113 / Louise Stewart</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. POLICY H2</td>
<td></td>
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</tr>
<tr>
<td>I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9326  Respondent: 8812097 / Clare Benzikie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16447  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4.2.36 should be reconsidered. Developers will almost always seek to pay in lieu or to build off site. Both of these make it LESS LIKELY in practice that the affordable homes will be built and IF they are encouraged "ghettoisation" and should be avoided. The taking up of this provision should be discouraged by requiring a HIGHER number of affordable homes to be delivered e.g 15% more. This could included in the formula referred to in 4.2.37

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/160  Respondent: 8823553 / Rick Day  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

4.2.36 would appear to be at odds with policy D1 by allowing developers to avoid providing a good mix of properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/185  Respondent: 8823553 / Rick Day  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

4.2.36 would appear to be at odds with policy D1 by allowing developers to avoid providing a good mix of properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17042  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2 - Affordable Homes

We fully understand and support the comment from many of our residents that affordability is critical to allow our youngsters to get a foot on the ownership ladder. We also appreciate that the term has a restrictive definition in the NPPF. However, the Local Plan must require a proportion of smaller houses as well as a realistic proportion of one and two bedroom apartments as well as smaller houses into which older residents may downsize. This should appear in the Local Plan at policy H2. We appreciate that smaller houses may not deliver the level of profitability associated with the sale of 4 and 5 bedroom houses but they must still appear in the housing mix irrespective of the views of developers.

We challenge the implied conclusion that building more houses will bring down house prices, thereby making them more affordable. The analysis excludes the impact of being within commuting distance of London, which pushes house prices to undesirably high levels. There is also clear evidence in Guildford that developers make more money from larger and
higher value houses which underpins our argument that building more houses will not have any real effect on house prices. What we need is a wide range of house sizes and prices - this would address the needs of the market.

Conclusion - the policy should require that a proportion of smaller houses should be built as well as smaller apartments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6771  
Respondent: 8826145 / William Hewlett  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. Comments relating to Policy H2: Affordable Homes

I OBJECT to the conclusions in the Plan for this area (see also comments relating to Policy H1, above), because West Horsley Parish Council has determined (from a 2014 survey) that there is only a limited need for up to 20 affordable homes for local people who want to remain in the village, i.e. young people or elderly people downsizing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3120  
Respondent: 8826177 / Charles Spence  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy H2. Neither the policy nor the supporting Green Belt papers give any coherent justification for the proposed changes to the Green Belt. Indeed, policy H2 refers frequently to the quality of the countryside within the Borough. There are no exceptional circumstances that justify building the majority of the proposed new houses on Green Belt land or for insetting villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13392  
Respondent: 8826369 / Tim Madge  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2
POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular, a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly, no amount of affordable housing will ever meet demand.

In addition, the definition of an ‘affordable home’ is 80% of market value. With even a 2-bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

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As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object the change in policy on affordable homes (Policy 4.2.23)

The policy says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

This means that the developer doesn’t even have to provide any ‘affordable’ homes, but just to make a negotiated payment to the Council. I doubt this is likely to result in the construction of any ‘affordable’ homes.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY H2

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And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly dispute the implication in this policy that building more houses will bring house prices down, thereby making them more affordable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3295  Respondent: 8832513 / Richard Russell  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT because "Affordable Homes" by their very definition, means those sold or rented at 80% of market value which, given the high value of land in West & East Horsley, will effectively mean they are UN-affordable. Inevitably, the building of such homes is effectively a placebo to developers who will be 'here-today' and 'gone-tomorrow' with absolutely no concern for the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17404  Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Draft Policy H2 is inconsistent with the NPPF and unsound because it does not expressly deal with development viability and deliverability, notwithstanding this is recognised within the reasoned justification to the policy (at paras 4.2.39-40).

The latter recognises that there may be some circumstances where abnormal costs would make scheme delivery unviable and that, where developers demonstrate to the Council's satisfaction that providing the amount of affordable housing required by this policy would not be economically viable, they will adopt the following cascade mechanism to assist with delivering a scheme:

- vary the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; and
- reduce the overall number of affordable

The draft policy itself, like Policy H11 of the saved 2003 Local Plan, is recognised to then rely upon the 2011 Planning Obligations SPD which indicates that, where it is not viable for a development to meet all the requirements of this SPD (i.e. including affordable housing), a flexible approach will be taken by the Council. We consider the approach to be taken where proposed developments - for whatever reason - are found to be unable to support affordable housing at the prescribed 40% level, should be addressed in the policy itself, given the importance of deliverability within the NPPF.

We would therefore suggest that the following text should be added after the second paragraph:
"Where developers demonstrate to our satisfaction (informed by an independent expert critique) that the amount of affordable housing proposed is the maximum amount a scheme can afford, as a consequence of abnormal costs or other circumstances, this Policy will treated as being satisfied subject to agreement to the introduction of a ‘cascade mechanism’ within the S106 planning obligation so as to contem plate alternative provision should development viability so allow in the future…”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13864</th>
<th>Respondent: 8835553 / David Pile Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

Because this is proposed expansion of housing stock is probably to be a commercial development very few of the houses are likely to be truly affordable.

In summary, I object to the wholly disproportionate expansion of East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15761</th>
<th>Respondent: 8836129 / Roger Shapley Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. The viability clause (4.2.40) means that in practice the policy could be unenforceable

The capacity to deliver these in the plan period is distorted by the presence of students in market housing that should be available in the affordable sector due to the University of Surrey failing to build over 2,000 accommodation units for which it has existing permissions, forcing students to rent off campus.

The Target and Monitoring Indicator for Traveller pitches effectively sets no upper limit on the number of pitches that might be built after the first Local Plan review. The current plans for traveller and travelling showpeople pitches continue to place undue burden on the western wards of the borough affecting community cohesion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16213</th>
<th>Respondent: 8839041 / Jon Maslin Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
</tr>
</tbody>
</table>
I object to policy H2 Affordable homes.

‘Affordable’ homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of ‘affordability’ is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. I support the policy to build 40% of new homes in the affordable bracket. These homes should have some constraint to stop them all being built as Starter Homes as these will stop being affordable after 5 years. Greater numbers of Social Housing should be included and levels of each type of affordable homes set.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16116  Respondent: 8840161 / Richard Ayears  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the policy to build 40% of new homes in the affordable bracket. These homes should have some constraint to stop them all being built as Starter Homes as these will stop being affordable after 5 years. Greater numbers of Social Housing should be included and levels of each type of affordable homes set.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2320  Respondent: 8840161 / Richard Ayears  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the need for affordable homes within the borough and the inclusion must be firmed up to ensure all developments include the correct ratio of affordable homes and that loop holes previously used to by-pass this provision are closed.

I support the proposals for the mix of affordable homes however the mix of property size and classification of type must be amended to ensure a significantly higher proportion of family homes are included and the number of single bedroom properties are reduced within allocations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13180  Respondent: 8840449 / David Wilson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2: Affordable homes

4.1. I agree with the need for affordable housing, but I OBJECT to the high volumes and high densities proposed in the West Horsley areas.
4.2. See also 3.1.2 above

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18177  Respondent: 8843361 / Adrian Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. The viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. For clarity "affordable" is a word which is being used. In the context of the plan "affordable" is 80% of the market rate in that area. So it is just a word. 80% of unaffordable is still unaffordable. It is just a word. To illustrate the point Cllr Reeves says [http://www.guildford-dragon.com/2016/06/17/letter-urgent-housing-need-guildford/](http://www.guildford-dragon.com/2016/06/17/letter-urgent-housing-need-guildford/)

There are 20 rented one bedroom flats in the development that are classified as “affordable” and let at what is referred to as “affordable rents”.

Affordable rents are normally 80% of a market rent or may be set at the equivalent Local Housing Allowance rate (Housing Benefit rate) if this is lower, which means the rents are currently some 40% higher than equivalent town centre council owned one-bedroomed flats.

The term “affordable” is a misrepresentation. Although lower than the market rent, these flats are beyond the reach of many with a regular but not highly paid job. Additionally, new welfare reforms also affect younger single people and have made these flats unsuitable for those that will be under the age of 35 on April 1st 2018, as, after that date, any new tenants will only be entitled to less than 50% of the housing benefit than they can claim at present.

Given that over half of our single housing applicants are under 35, they would not be able to afford to live at this development.

The affordability issue means all those that have expressed interest in the flats have been subject to financial assessments to ensure that they can afford the rents and council tax as well as meet their day to day living expenses without getting into financial difficulty in the future.

Sadly it has been shown that although there are very many housing applicants that would love to live in these properties, they simply cannot afford to do so”This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4090  Respondent: 8846177 / Moira Tailby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
In 2014 a Housing Survey by West Horsley Parish Council showed a need for only up to 20 affordable homes for local people who wished to remain in the village. So what is the justification for 385 new homes, which would result in development totally out of character with the existing mix of homes?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am unable to agree or not agree as type of housing not stated. How much is social and affordable?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I partly object. There is much mention of “affordable” homes and they do of course sound a worthwhile ambition. However, in the glossary, Guildford’s affordable rent is stated as 70% of local market rent, which with Guildford’s high housing prices is not really affordable at all for low paid workers who are essential to this borough’s success. Unfortunately “affordable” no longer means affordable in this country, and is now widely used as a euphemism to ease the conscience of local authorities while maintaining the profits of an obscenely inflated housing industry. If Guildford is such an affluent borough as claimed, it should supply some genuine social housing too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Paragraph (2) in policy box.

“WE WILL SEEK at least 40 per cent of the homes on these sites as affordable homes…”
I object. Policy statement has been weakened too much. There should be more emphasis on the requirement being 40 per cent, and only allowing exceptions where absolutely and legally justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Strengthen wording on 40 per cent requirement.

Attached documents:

Comment ID: PSLPP16/3186  Respondent: 8850433 / Ian Doherty  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally compliant? ( )

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this 'one-size-fits-all' policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a 'rural area' under the 1997 Housing Order and therefore is not exempt from the new 'right to acquire or enfranchise' entitlement - a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC's own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick resale at a generous profit, at which point these homes also become lost to the affordable sector.

I accordingly OBJECT to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16375  Respondent: 8850881 / N Reardon Smith  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally compliant? ( )
I wish to stress that I am not against development and new housing, per se, particularly affordable housing for young families and I understand that there is a real, tangible problem in the country as a whole with housing stocks. However, all development must take place in a balanced and sustainable way and the answer is NOT to identify Green Belt areas near to London which it would appear are "easy targets" for developers. This is the lazy option and is what GBC appears to be doing. The Local Plan MUST take into account the view of local residents and the GBC councillors would do well to remember that they are elected by residents and that they work for the residents whom they should try and represent at all times. To me, it certainly feels that this latest version of the Local Plan is being "bulldozed" through and I would sincerely hope and request that GBC listens to its electorate and responds in a constructive, responsible and ethical way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13314   Respondent: 8850945 / Richard Bayes   Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2: Affordable Homes

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

I therefore object to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12852   Respondent: 8851233 / Helen Bayes   Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2: Affordable Homes
I object to Policy H2

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.
The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to policy H2 Affordable homes.

"Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

I agree we need housing (council) and lower priced houses for starter homes but not the larger executive homes that the builders want to build to make more money. Builders pledge to do things and we do not trust them to carry out what they say. Don’t make Guildford Shaped by developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes would be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed might influence the market in more remote parts of the UK, but not here.

This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

In the draft Local Plan affordable homes is a misnomer, a designation that could have come straight from George Orwell’s Ministry of Truth. It refers to houses that are expected to go onto the market at 20% below the “market” price, or available at a rent of 80% of the prevailing “market” rate. Some of these are built to lower specifications than neighbouring houses, so that they remain profitable for builders. But when house prices and rents are high, so-called affordable homes are not affordable to those with low paid jobs or on benefits. “Affordable” homes are not the same as social housing, or old style council housing, and are not a replacement for any social housing that is sold off. Across the borough, according to the most recent data from the ONS, in Feb 2016, there were 5,696 housing benefit claimants. These “affordable” homes will be of no use to these people, or others on benefits, or on low wages. There is nothing in this policy for these people, many of whom need social housing, which has historically truly been affordable.

The Policy Statement (blue text in the Strategy and Sites document) refers to working “to increase the number of affordable homes in the borough and meeting identified needs.” But there is nothing in this plan that will meet the needs of those on benefits, or on low wages.

The Policy goes on to say that on sites “providing five or more homes, or sites of 0.17 ha regardless of the number of homes, at least 40% of the homes must be affordable homes....” A site of 0.17 ha is only 0.4 acre, and many single homes are built on plots of this size. This is a very low threshold. No exemptions are given – for example, what about self-build housing, or shared ownership, etc? This policy does nothing to encourage various paths to property ownership, other than the affordable housing route – which for many people is simply not an option. It is poorly thought out and is based on data which is not accurate, including the West Surrey SHMA, which in any case should be revised because of the poor understanding of the borough’s population statistics that underpin the study and the Brexit vote.

In the wording of the text supporting this Policy there are many errors of fact, errors through omission and exaggerations in the introductory text to this policy. As an affordable homes policy should be a cornerstone of the Local Plan, some of these are reviewed in depth below.

Paragraph 4.2.30

The final sentence of this paragraph reads: “High demand and limited supply have resulted in one of the least affordable areas of the country to live in”.

This is a profound statement, but one that was made without any supporting analysis, so it appears to be based on supposition, not on fact. Relevant analysis would consist of looking at demand for housing through, for example, population growth; then at the supply of new homes and the balance between these – and then compare this with property price increases. Then a similar analysis should examine other areas too, to assess if Guildford Borough is different from other local authorities within the south east. Obviously, this type of detailed analysis is not possible in a submission on the draft Local Plan, but the fact that this statement was made in paragraph 4.2.30 without any supporting information is a major concern, as this unsupported statement in itself could be considered to be the driver for housing policies within this draft Local Plan.
There is no question that property prices are high within the borough, but this is largely a consequence of being close to London, with a reasonably fast train connection. A Local Plan is supposed to focus on local needs, not the needs of those who wish to move out from London. All of Surrey and the home counties have high prices and recent statistics show that the rate of price increases in the East has been higher than in the South East. High prices are not a phenomenon unique to Guildford. This is shown in Figure 1, which shows that price increases in Guildford are mirrored in Woking and Dorking, which are in neighbouring boroughs. In fact, this shows that over the last two years price increases in Dorking have been higher than in Guildford. This figure was generated on the Zoopla website. <see attachments>

It is also incorrect to suggest that high prices are a consequence of an imbalance between supply and demand – there are many factors that have an impact on property prices; the supply and demand balance is only one of these. Although it is not appropriate to have a detailed critique of why housing costs are high, as one of the declared goals of the Local Plan is to increase affordability it is appropriate to comment on other factors that affect house prices, and this has been done in Annex 1. This also provides a borough wide analysis of the supply of housing between 2001 and 2011 and the demand for new housing, using census data.

This shows that the population of the borough increased by 7,482 persons, of whom 3,723 were full time students aged 18 and over. A few of these may have been Guildford residents but the vast majority would be new to the area. Some students find accommodation in student halls, and as this accommodation expanded during this time period, it has been assumed about 40% of the increase in student population would find accommodation in student halls, leaving 2,234 that would need accommodation in the town. With 4 students per house, this need would be equivalent to 559 houses.

Census data for 2011 revealed that the average household in the borough was 2.42 persons, so the increase in demand for housing caused by the increase in population (excluding students), assuming 2.42 persons/household, was 1,553 new houses.

Thus the total number of new dwellings required by Guildford’s population increase between 2001 and 2011 was 2,112 (559 plus 1,553). In fact, the census reveals that the number of new dwellings was 2,692 – so supply actually exceeded demand by a considerable margin, about 28%. Yet over this period Land Registry data shows the average house price in Guildford borough almost doubled. As supply exceeded demand, other factors beyond the supply and demand balance affected house prices. This means that the underlying premise behind the Local Plan is incorrect; house prices have not increased because of a supply/demand imbalance. At the very least this means that the 31 houses added to the housing target to promote affordability should not be included, but in fact the whole of the SHMA and Local Plan should be revised, to include a more accurate picture of the housing market, which is currently poor.

However, there has been no detailed analysis by GBC of housing needs, this was contracted out to a consultant, and the housing model used by that consultant has not been subject to any scrutiny. The SHMA did not examine fundamental reasons for house price increases, nor did it properly examine the historic supply and demand balance across the area. Consequently, the SHMA is not fit for purpose, as no understanding of the fundamental workings of the housing market was shown in this study. Had a proper analysis been carried out it would have shown that in 2015/6 across the borough there were 2,510 housing transactions, and analysed the price bands of sales. Of these, 713 housing transactions were below £300,000, which is approximately what a couple on average earnings in the borough could borrow. A more detailed breakdown is given in Annexe 1.

**Paragraph 4.2.31**

In paragraph 4.2.31, the text of the opening sentence reads “The West Surrey Strategic Market Assessment 2015 indicates that approximately half of the Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy.”

This sentence is plainly nonsense. The census data of 2011 showed that 66.6% of Guildford households either already owned or were in the process of buying their home. If the sentence refers to new households being formed in Guildford during the plan period, it should say so. If that were the case, it would not be surprising – the statistics on which the housing projections were based included a large increase in the number of full time students, a fact which was ultimately overlooked by GBC consultants, despite this being noted in several places in the SHMA. As shown in Annexe 1, census data shows 50% of the increase in population from 2001 to 2011 were students – and very few of these would be seeking...
to buy in Guildford, but are unlikely to take up a place at the university unless they had adequate funding, including the means to pay their rent.

**Paragraph 4.2.32**

Paragraph 4.2.32 discusses affordability in more depth and provides the ratio used by GBC to assess affordability. There are many definitions of affordability in use by different organisations and frequently this is a ratio between pay and house prices. GBC have decided to use a ratio which is of very limited value – the ratio of the lowest 25% of earnings to the lowest 25% of house prices. The higher this ratio, the less affordable the housing. This is a remarkable ratio as at the peak of home ownership in the UK, home ownership was just over 70% of total households. This is not because the remaining 30% did not want to own a house, although some did, but because in many cases home ownership was not a suitable option. This would apply to students, to migrant workers who wish only to work in the UK for a short time; people who do not want the responsibilities that comes with home ownership; people with temporary employment contracts, armed forces personnel, etc, etc. But GBC have chosen to consider affordability using the lowest paid – a group that have never been able to afford home ownership, or who may have no desire for home ownership. It is a bizarre ratio to use and is completely inappropriate to assess affordability in the borough.

It is more normal to consider the ratio between average pay and average property prices, though this is not an especially good ratio either, as average pay gives a certain weight to the lowest paid, who have never been able to afford home ownership. Average house prices are not a good measure either, as the sales of a few high cost properties will tend to push up average prices and distort the affordability ratio. It is much better to use the median property price in an affordability ratio. Another more relevant ratio is to use the average pay of first time buyers and the median price of properties purchased.

The text in the paragraph goes on to use government figures) from 2013, quoting GBCs affordability ratio (bottom 25% of wages to bottom 25% of house prices) of 10.92 which was said to be “higher than Surrey’s ratio of 10.89”.

The difference between these two ratios was 0.03, or in percentage terms, 0.28%. In others words, given that affordability ratios are estimates, there is no significant difference between these numbers. So it was nonsense to infer that property in the borough was less affordable in 2013 than in the rest of Surrey.

The text also states that the most recent data for this affordability ratio is from 2013, but in fact up to date information is provided by way of an interactive map which shows that Guildford Borough has a better affordability ratio than all but one of its neighbouring boroughs. In other words, housing is more affordable in Guildford than in most neighbouring boroughs. Data provided by the ONS was from Q3 2014 to Q3 2015, as full details for 2015 were not available. This map (and a supporting spreadsheet) provides 2 ratios, for median earnings to median house prices and GBC’s preferred measure, lower quartile earnings to lower quartile house prices. These are given in Table 1, and on GBC’s preferred lower quartile measure, Guildford is the most affordable of 6 of the 7 authorities listed, with only Rushmoor more affordable. On the more appropriate ratio of median pay to median property prices Guildford and Surrey Heath were essentially the same, with only Rushmoor again more affordable.

**Table 1. Affordability Ratio Comparisons**

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Lower Quartile Ratio</th>
<th>Median Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elmbridge</td>
<td>14-19</td>
<td>15-17</td>
</tr>
<tr>
<td>Woking</td>
<td>13-95</td>
<td>13-31</td>
</tr>
<tr>
<td>Waverley</td>
<td>13-7</td>
<td>14.67</td>
</tr>
<tr>
<td>Mole Valley</td>
<td>11.63</td>
<td>12.98</td>
</tr>
<tr>
<td>Surrey Heath</td>
<td>11.61</td>
<td>11.87</td>
</tr>
<tr>
<td>Guildford Borough</td>
<td>10.89</td>
<td>11.94</td>
</tr>
<tr>
<td>Rushmoor</td>
<td>8.95</td>
<td>7.85</td>
</tr>
</tbody>
</table>
This data shows clearly that GBC were incorrect to say that up to date affordability data was not available and more importantly, that of the local authorities that share a boundary with Guildford Borough, housing in Guildford Borough is actually more affordable than in almost all neighbouring local authorities.

Another indication of Guildford’s relative affordability was provided by an article in the Daily Telegraph3. This was about a couple who had been resident in London, but had moved to Guildford so that they could save for a deposit, but who were considering a move back to London. A comparison was made of the costs of living in Guildford or London, including travel costs to work in London, which showed that annual costs in Guildford were lower by an estimated £3,052; about 16% cheaper living in Guildford than in London. This is why people are moving from London to Guildford – and is why if houses were built as per the Local Plan target, they would mostly be bought or rented by Londoners, not by residents of the borough.

Paragraph 4.2.23

This paragraph refers to sufficient housing to meet the needs of the borough’s population – but the proposed minimum of 693 dwellings a year is well in excess of the needs of the borough’s residents. The data used in the SHMA ignored the effect of full time students and so the housing number is very considerably in excess of the needs of the resident population. If this housing is delivered it will cause an increase in Guildford’s population that is considerably more than recent population growth – almost 5 times the rate of population growth during the period between the censuses of 2001 and 2011.

The final part of the paragraph is nonsense “…..ensuring people with a wide variety of occupations in the borough and potentially reducing travel to work journeys.”

Housing proposed in the Local Plan is mostly in the countryside, with about 70% of the housing proposed on land that is currently in the Green Belt. These locations are some considerable distance from employment centers, many of which are located in central Guildford – so journeys to work will increase, not reduce, and congestion will get much worse. This issue is considered in detail in Annexe 2, which shows clearly that building new homes in the countryside will result in many more traffic movements than building homes within Guildford.

**Housing Supply and Demand Balance Analysis in Guildford Borough: 2001 to 2011**

As census data is considered by the Office for National Statistics (ONS) to be their “gold standard” this analysis uses only census data. Although data for subsequent years is available, this is based on many estimates and so analysis is more subjective.

Across the borough, during the 10 year period between the two most recent censuses4, the number of dwellings in the borough increased by 2,692, an average of 269 dwellings per year. During the same period, the population of the borough increased by 7,482 persons, but a high percentage of these were full time students, aged 18 and over. Some of these students may have been local, but as this was probably a small number, it was ignored. This data is summarised in Table 2, below.

Table 2 Censuses data for Guildford Borough

<table>
<thead>
<tr>
<th>GBC</th>
<th>2001</th>
<th>2011</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings</td>
<td>53,388</td>
<td>56,080</td>
<td>2,692</td>
</tr>
<tr>
<td>Population</td>
<td>119,701</td>
<td>137,183</td>
<td>7,482</td>
</tr>
<tr>
<td>Students (18+)</td>
<td>7,004</td>
<td>10,727</td>
<td>3,723</td>
</tr>
<tr>
<td>Persons/household</td>
<td>2.32</td>
<td>2.43</td>
<td>0.10</td>
</tr>
</tbody>
</table>
Some of the increase in students would have found accommodation in students halls of residence (for example, the development in Manor Park opened in 2005) it is assumed that about 40% of the increase in student numbers were in student halls of residence, leaving 2,234 to find accommodation elsewhere. The majority of these would have found rooms in privately rented houses, categorised as “Homes of Multiple Occupation”. Assuming 4 students per house, the increase in student numbers would have needed 559 extra houses. The remainder of the population increase, the “permanent” resident population of Guildford, increased by 3,759 people. As the average number of people per household was 2.42 in 2011, a further 1,553 dwellings were needed for this increase in population. So to house the overall increase in population, including students, about 2,112 additional houses were needed – but 2,692 were built. Thus the number of houses needed in Guildford to house the population increase was actually substantially lower than the supply available; so the balance between supply and demand was not responsible for the increase in house prices over this period, when average property transaction prices across the borough almost doubled.

During the financial years 2001 to 2011, average property transaction prices across the borough are shown in Table 2. This includes average and median property prices for transactions in the years shown. In any given year there may be several high priced transactions which distort an average, and so the median price is also given – the median is the mid-range price, so that 50% of transactions were below this price with 50% above. It is a better indicator of the movement of prices than averages. Also shown is the number of transactions for each year.

Table 3. Land registry property prices in Guildford Borough

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Price (£)</th>
<th>Median Price (£)</th>
<th>Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001/2</td>
<td>218,637</td>
<td>172,000</td>
<td>3118</td>
</tr>
<tr>
<td>2002/3</td>
<td>254,406</td>
<td>199,995</td>
<td>3211</td>
</tr>
<tr>
<td>2003/4</td>
<td>275,070</td>
<td>220,000</td>
<td>3036</td>
</tr>
<tr>
<td>2004/5</td>
<td>294,235</td>
<td>240,000</td>
<td>2851</td>
</tr>
<tr>
<td>2005/6</td>
<td>303,612</td>
<td>246,250</td>
<td>2974</td>
</tr>
<tr>
<td>2006/7</td>
<td>336,925</td>
<td>250,000</td>
<td>3294</td>
</tr>
<tr>
<td>2007/8</td>
<td>381,221</td>
<td>289,950</td>
<td>2867</td>
</tr>
<tr>
<td>2008/9</td>
<td>354,322</td>
<td>250,000</td>
<td>1481</td>
</tr>
<tr>
<td>2009/10</td>
<td>354,198</td>
<td>270,000</td>
<td>2127</td>
</tr>
<tr>
<td>2010/11</td>
<td>414,167</td>
<td>303,000</td>
<td>1916</td>
</tr>
<tr>
<td>2015/16</td>
<td>486,158</td>
<td>391,750</td>
<td>2510</td>
</tr>
</tbody>
</table>

The data in Table 2 shows that prices increased very rapidly from 2001/2 to 2007/8, and that the number of transactions was quite constant, at about 3,050±200. This represented a turnover of about 5.6% of all of the dwellings in the borough (53,388 in the 2001 census). Then in 2008/9, prices fell, and stayed low for two years. If the balance between supply and demand were the only factor influencing house prices this would suggest a huge increase in supply – but this did not occur. It can be seen from this that the balance between supply and demand must have had a minor impact on house prices. In fact, determining factors were the availability and cost of credit, and the demand for housing outside London. Credit was freely available and credit costs (in real terms) were low, consequently house prices increased rapidly from 2001/2 to 2007/8.

Data from Table 2 is shown in graphical form in Figure 1, and the impact of the recession of 2008/9 is clear. It interrupted the increase in property prices – but the reduction in interest rates that accompanied this recession, which provided very low credit costs, resulted in property prices increasing again in 2010/11. Credit costs continue to be very low and when combined with the huge expansion in credit from quantitative easing, the price of assets increased sharply. Again, this had little, if anything to do with the supply and demand balance for housing.
This picture of supply of housing exceeding demand across the borough is similar to the national picture. According to an article in the Guardian newspaper, across the nation between the years of 1997 and 2007, “the housing stock grew by 10%, but the population only grew by 5%. If house prices were a function of supply and demand, they should have fallen slightly over this period. They didn’t. They rose by more than 300%.”

So the issue of high prices is a national issue, not confined to Guildford Borough, and is not solely because of the supply and demand balance. Building more houses to increase affordability within the borough will not have the desired effect. This conclusion (based on data) is at variance with the Local Plan, and shows clearly that the evidence base underpinning the Local Plan is suspect, and that the analysis in much of this data base, especially the West Surrey SHMA, is inadequate.

The cursory analysis above also indicates the severe impact of having an additional 693 dwellings coming onto the housing market. At the beginning of the recession, in 2008/9, there were only 1,481 property transactions across the borough. Adding 693 dwellings to this would create many problems for any existing householders who wished to sell. As new build housing would be attractive to anyone moving from London, and is more expensive than equivalent “used” housing, the average price for housing would probably not fall – but householders would be forced to reduce their selling price in order to sell.

Given that the number of domestic property transactions in 2015/16 was 2,510, adding 693 houses to this mix would mean that redevelopment projects would not proceed. Existing run down areas of Guildford would become more run down – there would be no incentive to revitalise them under this proposed plan. Green field sites outside Guildford would provide the bulk of new dwellings – so large areas of Guildford would simply be left to decay. This is contrary to policies within the NPPF, specifically those policies that protect the Green Belt.

Table 4. Housing transaction prices in Guildford Borough

<table>
<thead>
<tr>
<th>Number of transactions</th>
<th>Average of these</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>&lt;£100,000</td>
</tr>
<tr>
<td>183</td>
<td>&lt;£200,000</td>
</tr>
<tr>
<td>713</td>
<td>&lt;£300,000</td>
</tr>
<tr>
<td>1312</td>
<td>&lt;£400,000</td>
</tr>
</tbody>
</table>

According to other ONS statistics, average earnings for Guildford residents in 2015 was £33,557 per year. A couple, with both on average earnings, using a multiple of 4.5 times earnings, could take out a mortgage for just over £300,000. According to the 2015/16 Land Registry data they would have had a choice during 2015/16 of at least 713 properties. This suggests that the affordability issue in Guildford has been exaggerated in order to promote a pro-development agenda.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: pollution.jpg (35 KB)
car van.jpg (20 KB)
zoopla.jpg (31 KB)
figure2.jpg (39 KB)
Factors that Affect House Prices and Affordability

Across the UK, much of the planned increase in house building is related to the issues of high house prices and affordability – building more houses to increase the supply has been the approach adopted by the government, even though this policy is high risk, for example, consider the collapse of the housing markets in Spain, Ireland, etc in 2008/9 as a consequence of their massive house building programmes. There has been no risk analysis associated with the policy, either nationally or locally in the borough. House building appears to have been put in place as a strategy to drive economic growth, so that a great deal of effort (and government subsidy) has been devoted to this policy, to the detriment of other important policies, such as regional and industrial.

Affordability is not just a question of increasing housing supply, it is much more complex and a proper analysis should examine associated questions such as: why have real wages in the UK increased so slowly? Slow growth in wages means that house prices have outstripped the growth in real wages, and so affordability ratios have fallen. A sound, sustainable economy will not be built by housebuilding alone and to pursue this path is to embark on a policy that could well end in ignominious failure, with a housing bust similar in scale to that experienced in Spain and Ireland. But what other factors are important in determining house prices and affordability?

When considering this issue of affordability, and the approach of building more dwellings, there is an implicit assumption that the only determinant of house prices is the balance between supply and demand. But this is a nonsensical assumption. In 2008, when house prices in many regions of the UK (and across the world) started to crash, this was not because of a sudden massive increase in supply. Many other factors were clearly at work. Other factors that are important in determining house prices include:

- The cost of credit – the interest rate: effectively this is set by government policy via the Treasury and then by the Bank of England. This has been extremely low for 5 years, and is set to remain low for the foreseeable future. Even before the reduction in the Bank of England rate to 0.5%, the real cost of credit had been low for many years – largely because the governments preferred measure of inflation, the CPI, does not include a measure of housing costs. The current very low cost of credit means that mortgage payments as a percentage of take home pay are lower for first time buyers than during previous property booms of 2005-7 and 1989-90. House prices are set by what people can afford to pay, and so property prices have climbed.

- The availability of credit. At the very least this is regulated by government, but in practice it is effectively set by government policy, for example, quantitative easing has resulted in huge credit expansion leading to asset price inflation, including house price inflation. Current high house prices are a direct consequence of the economic policies of successive governments, spanning a period of at least 20 years.

- Various schemes to assist buyers such as “Help to Buy” have enabled house builders to increase or maintain prices, so that much of the subsidies government pays ends up as builders profits. This is because, for example, equity loans are available only on new build properties.

- Housing subsidies paid by the government. In 2015, about £24 billion was paid out as housing benefit, of which about £8.8 billion was paid to private landlords. Consequently, housing benefit has largely driven the buy to let boom. With a secure rental income, buy to let landlords can bid up the price of houses, beyond the reach of other buyers.

- The growth of “buy to leave”, which is driven largely by money from overseas, some of which comes from the black economy and illegal activities in overseas countries. Overseas buyers effectively use a house in the UK (predominantly London and its environs) as a safe deposit box in the sky. This has led to a significant number of properties in London being sold to overseas buyers, who have no intention of living there – but their investment is safe and likely to appreciate in value. In the years 2015 and 2015, Asian buyers alone paid $24 billion for UK property, of which $20 billion was in London. This forces London residents to move out to the suburbs and beyond, pushing up prices across the whole of the south east. Brexit and associated financial instability is likely to have an impact on this, and it may create a downturn in the London housing market.
Taxes – not just stamp duty but other taxes contribute to the high final cost of a house. Taxes and levies on the excavation of raw materials from quarrying coupled with high landfill taxes increase the final cost of every house built, so that stamp duty is just another layer of tax – the icing on the taxation cake for government. What extraction taxes and energy policies have done is force the closure of British brick plants, cement makers, etc, etc. Now that there is a construction boom, building materials are being imported from all over Europe – bricks from Germany and further afield, roof tiles from Belgium, cement from France, etc. This leads to large increases in prices when there is an increase in construction – over the 5 years to 2016 brick prices increased by 25%, cement by 17%. The living wage will increase the pay of unskilled workers, such as labourers. Even in the recent past, a construction boom was a major stimulus for the British economy, but this is no longer the case because so much building material (and workers) are now imported. In 2015, the value of total imports of building materials from EU countries was £4.9 billion.

In addition, the Landfill Tax ensures that land is not used efficiently – it is cheaper to build large surface area car parks than to excavate and build car parks underground so that even when multi-storey car parks are built, they generally have no basement – because of the high cost of excavation due to high landfill taxes.

Guildford town is a classic example of inefficient land use, with large surface car parks at the university; park and ride car parks, at the railway station, and at employers throughout the town. This is a grossly inefficient use of land, but this inefficient land use is a consequence of government policy.

Profit margins of developers, which are currently somewhere between 20 to 30% on the cost of a house, even after high, exorbitant salaries are extracted from the companies for company executives.

As an example, Berkeley Homes has in place the most generous bonus system ever put in place by a British company, with £1 billion due to be distributed to company executives if certain targets are met – and the company is en route to meet these targets, mainly because of its ability to set and maintain high house prices. The chairman of Berkeley Homes was one of the highest paid persons in the UK in 2015, with his benefits amounting to more than £22 million for the year.

Profit margins enjoyed by housebuilders would not be tolerated in government regulated industries such as utility companies, or in food retailers, etc. It applies to the most expensive purchase the vast majority of purchasers will ever make, and it shows clearly that the housing market model used by the government (supply by the private sector only) is working only to benefit developers. It is functioning as a free market – but it is not a true free market because of the other factors that determine house prices such as government subsidies, including housing benefit. These create a win:win housing market for developers. The ability of developers to control housing supply is a major problem with the housing market – it is not the planning system that limits the supply of new dwellings, it is developers ensuring that they can maximise their profit margins by drip feeding new builds onto the market. The Local Government Association stated that there are potentially 400,000 dwellings with planning permission but construction had not been started. So the problem is in the operation of the market, not in the planning process. Reforms to the way that the housing market operates are long overdue, for example, through a large social housing programme, managed by a national housing executive.

Government regional policies also have an impact on house prices. This is evident in the way that property prices have or have not recovered after the property price crash in 2008. Not all regions currently have higher house prices than their 2007 peak values: This is clear evidence of an ineffective regional policy, and shows the publicity around creating a “northern powerhouse” is hyperbole. One strand of an effective regional policy would ensure that a genuine free market was allowed to run its course, so that as building in London and the south east became more difficult and expensive (due to strong planning policies protecting the Green Belt and countryside) development would be pushed to other regions, ensuring these regions grew. Instead, the government seek to make it easier for developers to build in areas with the highest growth, by weakening planning policies, so that development is concentrated in London and the south east, especially in the countryside. The effect of this policy (in reality the lack of an effective regional policy) means that demand for development of all types continues to grow in and around London, so that house prices can be increased and controlled by developers. This increases the wealth gap between the London plus the south east and other regions, and limits employment growth in these areas.

Immigration has a major role in the supply and demand equation – if the rate of immigration were not so high, the demand for housing would be substantially lower. Migration Watch have estimated that at least 40% of the housing demand is due to immigration, but their estimate was based on a lower number of migrants than the current level of
immigration, and does not include the impact of the children of migrants, nor does it include the demand from illegal immigration. Thus the government’s immigration policies have had a major impact on the demand for housing. Immigration also has an impact on pay – it helps keep pay levels low, so that employers are not forced to pay more to help with recruitment. This has an impact on affordability ratios. Although there is a construction boom, with a supposed shortage of skilled workers, pay within the construction industry has not increased as rapidly as it has done in the past. This is because employers can recruit immigrants, who will work for lower rates of pay, for example, 50% of sub-contractors working for Berkeley Homes are from eastern Europe. So not only does this policy have an impact on the supply part of the housing equation, but it also has an impact on the ability to afford housing by keeping pay rates lower than they would otherwise have been. A recent estimate by employers was that pay rates for skilled workers in construction have increased by 6%. Historically, this is a very low increase for pay rates in the middle of a construction boom. If immigration policies change as a consequence of the Brexit vote, the pressure placed on housing supply by immigrants will fall, and this should be reflected in revised housing policies.

**Contribution to Traffic Movements and Air Pollution**

The Local Plan proposes building a minimum of 693 houses per year, of which 2,400 (17%) will be built within Guildford. The remainder (83%) will be built in the countryside. This is very much against advice from the Institute for Air Quality Management. Intuitively, it seems likely that this spatial distribution of housing would increase car and van journeys with a consequential increase in air pollution that is related primarily to vehicle emissions. This paper examines statistical evidence to assess the impact on vehicle journeys within the borough.

**Spatial Vision**

The spatial “vision” proposed in the Local Plan is the reverse of that recommended by the Institute for Air Quality Management, who said:

“The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase road traffic.

This report also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done within the borough. This is despite requests to the council to set up an AQMA following air quality tests that show high pollution levels in at least one village which has high traffic levels.

**Sustainability**

To examine the claim that the draft Local Plan contributes to sustainability several areas could be analysed. One of these is the impact on traffic, to assess the impact of adding additional housing in the countryside rather than in Guildford centre. This can be gauged by comparing the likely impact on car ownership of building housing in a rural location as opposed to an urban area of Guildford. Effingham has been chosen for this, but it could be any of the rural villages in the borough, and the impact of additional housing in this village is compared with additional housing in an urban area, Walnut Tree Close/Station area. This can be done using census details, taken from the Office for National Statistics (ONS) publications, so that availability of cars and vans can be compared as well as methods of travelling to work.

What have traffic levels to do with sustainability?
Traffic is a major contributor to air pollution, and air pollution has a significant effect on health. In April 2014, Public Health England produced a report that reconfirmed the estimate by the Committee on the Medical Effects of Air Pollutants that approximately 29,000 deaths per year in the UK could be caused by pollution from man-made particulate matter. This report estimated that there were 55 deaths per year in the borough attributable to air pollution. Particulates are very small air borne particles and transport is the single largest contributor to particulate pollution.

But air pollution is not limited to air borne particles - it includes many other pollutants, and one group that affects human health, especially that of children, is the gaseous oxides of nitrogen, nitrogen dioxide (NO2) and nitrogen monoxide (NO). When taken together these are usually called NOx. Nationally, almost half of these gases are produced by transport. In a submission to the House of Commons Report “Action on Air Quality” published in November 2014, Dr Ian Mudway of King’s College, London said:

“We have also found effects on infant mortality rates, on pre-term birth and on cognitive performance in children. There is some interesting data emerging on traffic proximity, diesel emissions and traffic potentially autism spectrum disorders… The evidence over the last three or four years that children growing up near traffic in areas with high NO2 and primary particle emissions have stunted and impaired lung development is incredibly strong.”

As well as health aspects, road safety is also important – increased traffic levels means more congestion, more delays, more stress, and inevitably, more accidents.

Areas in London exceed the EU limits for various air-borne pollutants, in particular, NOx. This has been on a scale that will result in the imposition of substantial fines on the UK government – and the UK government has expressed a desire for this to be passed to local government in areas that are out of compliance. Although Guildford Borough has a very limited air pollution monitoring regime they have one station that regularly exceeds limits – that at Wisley. Even though this is very poorly sited (meaning that the actual NOx concentration in this area is considerably higher than that being recorded) it has consistently been above EU limits. Thus the borough’s taxpayers may have to share in the costs of the EU fine.

Since traffic has a major impact on air pollution, and as air pollution has a significant on health, especially that of children, it is an important element in sustainability – so the impact on traffic levels of housing policies should be assessed, in detail, before making claims that housing policies are “sustainable”.

Levels of car ownership vary substantially, as can be seen from the figure, taken from the data in Table 1. This data is taken from 2011 ONS Census data, as published in the series “Neighbourhood Statistics”.

The average number of cars or vans per household is highest in Effingham, with an average of 1.9 cars or vans per household in Effingham in 2011, compared to an average of 0.93 cars or vans per household in Woodbridge Meadows/Walnut the Station. This suggests that plans for high levels of development in the countryside go against all the ideals of achieving sustainable developments as car and van availability is an indicator of how often those vehicles will be used.

Table 1. Comparison of availability of cars or vans.

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2001</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Effingham (Parish)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>1.89</td>
<td>1.75</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>4.7</td>
<td>7.3</td>
</tr>
<tr>
<td><strong>Woodbridge Meadows, Walnut Tree Close and the station</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>0.93</td>
<td>1.01</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>34.2</td>
<td>30.0</td>
</tr>
</tbody>
</table>
In Effingham, there are very few households that do not have a car or van available, at 4.7% of total households, compared to 34.2% in Woodbridge Meadows, Walnut Tree Close and the Station. Given the limited range of shops and services available in rural villages this should not be surprising. Most residents have to drive to be able to access basic health services, and for all but the most basic of shopping needs, employment opportunities, etc. This shows very clearly that it is very likely that there would be increased traffic on the roads throughout the borough as a consequence of additional housing in the countryside, and that this increase in traffic would be lower if additional housing were built in the centre of Guildford.

Experienced city planners such as Lord Rogers have called for increased density in towns and cities as a way to provide extra housing, provided increased density is accompanied by improved amenities and sensible traffic management plans. This is because of the benefits of increased density – towns and cities work better, with better public transport, better access to services, and a reduction in car journeys. Woodbridge Meadows, Walnut Tree Close and the Station are ideal locations for increased population density – the railway station is within walking distance, as is much of the town centre. This is recognised to a limited extent by the Masterplan prepared for Guildford Borough Council, but does not seem to have been recognised in the 2016 draft Local Plan.

As the 2011 census had details of the methods used to travel to work, it is possible to test if traffic implications are in line with these expectations.

Methods of travel to work illustrate differing patterns of car and van use, with the details given in Table 2. In Effingham, only 14% of employed people who travel to work use public transport and almost 75% travel to work by car or van. Only 8% of those who travel to work walk or use a bicycle in Effingham, whereas in the Woodbridge Meadows/Station area the comparable figure is almost 33%.

Differences are illustrated in the figure showing the proportion of people who travel to work using public transport, walk or by bike. Building more houses in the countryside will result in many more car journeys – just to get to work. Many more would also be necessary, for residents to shop, to access financial and health services, etc. This shows clearly that car journeys would be minimised if new housing was concentrated in urban areas of Guildford.

Sensible planning should seek to improve the ability to use these modes of transport and the impact on the number of car or van journeys is very clear from the comparisons made here.

This type of analysis should be a feature when choosing to claim an option is “sustainable”, but it has not been a feature of the draft Local Plan. Claims made that building housing in rural areas is a sustainable option do not stand up to simple scrutiny, even without the consideration that it is proposed to build housing on the limited resource that is farmland.

Table 2 Comparison of methods used to travel to work in 2011.

<table>
<thead>
<tr>
<th>Travel to work, 2011</th>
<th>Effingham</th>
<th>Woodbridge Meadows, etc</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of those in employment working from home</td>
<td>10.5</td>
<td>5.2</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by car or van</td>
<td>66.9</td>
<td>34.4</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, by car or van</td>
<td>74.7</td>
<td>36.3</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work on foot or by bike</td>
<td>7.1</td>
<td>30.9</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, on foot or on bike</td>
<td>8.0</td>
<td>32.6</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by public transport</td>
<td>13.9</td>
<td>27.4</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, by public transport</td>
<td>15.5</td>
<td>28.9</td>
</tr>
</tbody>
</table>
Conclusions

The spatial planning in this draft plan will increase traffic movements and consequently, air pollution. Air quality should be a constraint used to limit the housing target. Even with a lower housing target, instead of what is proposed a higher proportion of housing developments should be within Guildford town. This could be achieved by recognizing that an expansion in retail and warehousing and distribution within the urban area is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality, with proposals to reduce noxious emissions, for example, through the use of LPG fueled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 24,000 cars and vans to those already in use within the borough, based on car ownership levels in a rural village and an urban area in Guildford. This is the approximate number of vehicles that the proposed housing additions would bring, thought his number would vary, dependent on where the additional houses are located. If all the proposed housing were within Guildford, then instead of 24,000 about 13,000 cars and vans would be added to the existing total. In the census of 2011, the total across the borough was just under 54,000 cars and vans.

The comparisons made above show that traffic and air quality has not been considered in the spatial allocation of housing. Sustainability claims have not been analysed in drawing up the housing proposals featured in the draft Local Plan. A simple comparison of only one aspect of sustainability, car use (with its associated air pollution), shows very clearly that building extra housing in Effingham (a typical rural area village) is the least sustainable option. As a method of travel to work, car use in Effingham was shown to be much higher than in an urban area of Guildford, so to limit increases in traffic and emissions from traffic, housing should be provided in areas closer to employment opportunities and with access to good public transport. This does not mean that no additional housing should be provided in the countryside, but this housing should be limited in quantity, in keeping with its Green Belt Status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: pollution.jpg (35 KB)
car van.jpg (20 KB)
zoopla.jpg (31 KB)
figure2.jpg (39 KB)


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8 POLICY H2 AFFORDABLE HOMES
8.1 I object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable, truly affordable or social housing need.

8.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

8.3 In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

8.4 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.
8.5 GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2417  Respondent: 8858433 / Eric Peters  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2 - Affordable Homes

I object. Under the national definition they are to be sold or rented at 80% of market value. Even at 70% these will remain beyond most people's means meaning they won't be available for local people. Affordability is being used to push more development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17065  Respondent: 8860833 / Stephen Compson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Sorry to be so negative as I do believe there is a fundamental need to provide affordable housing for key workers and young people in the Guilford area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2208  Respondent: 8860897 / Julia Shaw  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

“Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. I would be losing countryside for no local benefit.
“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes would be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed might influence the market in more remote parts of the UK, but not here.

This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

In the draft Local Plan affordable homes is a misnomer, a designation that could have come straight from George Orwell’s Ministry of Truth. It refers to houses that are expected to go onto the market at 20% below the “market” price, or available at a rent of 80% of the prevailing “market” rate. Some of these are built to lower specifications than neighbouring houses, so that they remain profitable for builders. But when house prices and rents are high, so-called affordable homes are not affordable to those with low paid jobs or on benefits. “Affordable” homes are not the same as social housing, or old style council housing, and are not a replacement for any social housing that is sold off. Across the borough, according to the most recent data from the ONS, in Feb 2016, there were 5,696 housing benefit claimants. These “affordable” homes will be of no use to these people, or others on benefits, or on low wages. There is nothing in this policy for these people, many of whom need social housing, which has historically truly been affordable.

The Policy Statement (blue text in the Strategy and Sites document) refers to working “to increase the number of affordable homes in the borough and meeting identified needs.” But there is nothing in this plan that will meet the needs of those on benefits, or on low wages.

The Policy goes on to say that on sites “providing five or more homes, or sites of 0.17 ha regardless of the number of homes, at least 40% of the homes must be affordable homes...” A site of 0.17 ha is only 0.4 acre, and many single homes are built on plots of this size. This is a very low threshold. No exemptions are given – for example, what about self-build housing, or shared ownership, etc? This policy does nothing to encourage various paths to property ownership, other than the affordable housing route – which for many people is simply not an option. It is poorly thought out and is based on data which is not accurate, including the West Surrey SHMA, which in any case should be revised because of the poor understanding of the borough’s population statistics that underpin the study and the Brexit vote.

In the wording of the text supporting this Policy there are many errors of fact, errors through omission and exaggerations in the introductory text to this policy. As an affordable homes policy should be a cornerstone of the Local Plan, some of these are reviewed in depth below.

**Paragraph 4.2.30**

The final sentence of this paragraph reads: “High demand and limited supply have resulted in one of the least affordable areas of the country to live in”.

This is a profound statement, but one that was made without any supporting analysis, so it appears to be based on supposition, not on fact. Relevant analysis would consist of looking at demand for housing through, for example, population growth; then at the supply of new homes and the balance between these – and then compare this with property price increases. Then a similar analysis should examine other areas too, to assess if Guildford Borough is different from other local authorities within the south east. Obviously, this type of detailed analysis is not possible in a submission on
the draft Local Plan, but the fact that this statement was made in paragraph 4.2.30 without any supporting information is a major concern, as this unsupported statement in itself could be considered to be the driver for housing policies within this draft Local Plan.

There is no question that property prices are high within the borough, but this is largely a consequence of being close to London, with a reasonably fast train connection. A Local Plan is supposed to focus on local needs, not the needs of those who wish to move out from London. All of Surrey and the home counties have high prices and recent statistics show that the rate of price increases in the East has been higher than in the South East. High prices are not a phenomenon unique to Guildford. Information from the Zoopla website shows that price increases in Guildford are mirrored in Woking and Dorking, which are in neighbouring boroughs. In fact, this shows that over the last two years price increases in Dorking have been higher than in Guildford.

It is also incorrect to suggest that high prices are a consequence of an imbalance between supply and demand – there are many factors that have an impact on property prices; the supply and demand balance is only one of these. Although it is not appropriate to have a detailed critique of why housing costs are high, as one of the declared goals of the Local Plan is to increase affordability it is appropriate to comment on other factors that affect house prices, and this has been done in Annex 1. This also provides a borough wide analysis of the supply of housing between 2001 and 2011 and the demand for new housing, using census data.

This shows that the population of the borough increased by 7,482 persons, of whom 3,723 were full time students aged 18 and over. A few of these may have been Guildford residents but the vast majority would be new to the area. Some students find accommodation in student halls, and as this accommodation expanded during this time period, it has been assumed about 40% of the increase in student population would find accommodation in student halls, leaving 2,234 that would need accommodation in the town. With 4 students per house, this need would be equivalent to 559 houses.

Census data for 2011 revealed that the average household in the borough was 2.42 persons, so the increase in demand for housing caused by the increase in population (excluding students), assuming 2.42 persons/household, was 1,553 new houses.

Thus the total number of new dwellings required by Guildford’s population increase between 2001 and 2011 was 2,112 (559 plus 1,553). In fact, the census reveals that the number of new dwellings was 2,692 – so supply actually exceeded demand by a considerable margin, about 28%. Yet over this period Land Registry data shows the average house price in Guildford borough almost doubled. As supply exceeded demand, other factors beyond the supply and demand balance affected house prices. This means that the underlying premise behind the Local Plan is incorrect; house prices have not increased because of a supply/demand imbalance. At the very least this means that the 31 houses added to the housing target to promote affordability should not be included, but in fact the whole of the SHMA and Local Plan should be revised, to include a more accurate picture of the housing market, which is currently poor.

However, there has been no detailed analysis by GBC of housing needs, this was contracted out to a consultant, and the housing model used by that consultant has not been subject to any scrutiny. The SHMA did not examine fundamental reasons for house price increases, nor did it properly examine the historic supply and demand balance across the area. Consequently, the SHMA is not fit for purpose, as no understanding of the fundamental workings of the housing market was shown in this study. Had a proper analysis been carried out it would have shown that in 2015/6 across the borough there were 2,510 housing transactions, and analysed the price bands of sales. Of these, 713 housing transactions were below £300,000, which is approximately what a couple on average earnings in the borough could borrow. A more detailed breakdown is given in Annexe 1.

**Paragraph 4.2.31**

In paragraph 4.2.31, the text of the opening sentence reads “The West Surrey Strategic Market Assessment 2015 indicates that approximately half of the Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy.”

This sentence is plainly nonsense. The census data of 2011 showed that 66.6% of Guildford households either already owned or were in the process of buying their home. If the sentence refers to new households being formed in Guildford during the plan period, it should say so. If that were the case, it would not be surprising – the statistics on which the
Paragraph 4.2.32

Paragraph 4.2.32 discusses affordability in more depth and provides the ratio used by GBC to assess affordability. There are many definitions of affordability in use by different organisations and frequently this is a ratio between pay and house prices. GBC have decided to use a ratio which is of very limited value – the ratio of the lowest 25% of earnings to the lowest 25% of house prices. The higher this ratio, the less affordable the housing. This is a remarkable ratio as at the peak of home ownership in the UK, home ownership was just over 70% of total households. This is not because the remaining 30% did not want to own a house, although some did, but because in many cases home ownership was not a suitable option. This would apply to students, to migrant workers who wish only to work in the UK for a short time; people who do not want the responsibilities that comes with home ownership; people with temporary employment contracts, armed forces personnel, etc, etc. But GBC have chosen to consider affordability using the lowest paid – a group that have never been able to afford home ownership, or who may have no desire for home ownership. It is a bizarre ratio to use and is completely inappropriate to assess affordability in the borough.

It is more normal to consider the ratio between average pay and average property prices, though this is not an especially good ratio either, as average pay gives a certain weight to the lowest paid, who have never been able to afford home ownership. Average house prices are not a good measure either, as the sales of a few high cost properties will tend to push up average prices and distort the affordability ratio. It is much better to use the median property price in an affordability ratio. Another more relevant ratio is to use the average pay of first time buyers and the median price of properties purchased.

The text in the paragraph goes on to use government figures) from 2013, quoting GBCs affordability ratio (bottom 25% of wages to bottom 25% of house prices) of 10.92 which was said to be “higher than Surrey’s ratio of 10.89”.

The difference between these two ratios was 0.03, or in percentage terms, 0.28%. In others words, given that affordability ratios are estimates, there is no significant difference between these numbers. So it was nonsense to infer that property in the borough was less affordable in 2013 than in the rest of Surrey.

The text also states that the most recent data for this affordability ratio is from 2013, but in fact up to date information is provided by way of an interactive map2 which shows that Guildford Borough has a better affordability ratio than all but one of its neighbouring boroughs. In other words, housing is more affordable in Guildford than in most neighbouring boroughs. Data provided by the ONS was from Q3 2014 to Q3 2015, as full details for 2015 were not available. This map (and a supporting spreadsheet) provides 2 ratios, for median earnings to median house prices and GBC’s preferred measure, lower quartile earnings to lower quartile house prices. These are given inTable 1, and on GBC’s preferred lower quartile measure, Guildford is the most affordable of 6 of the 7 authorities listed, with only Rushmoor more affordable. On the more appropriate ratio of median pay to median property prices Guildford and Surrey Heath were essentially the same, with only Rushmoor again more affordable.

Table 1 Affordability Ratio Comparisons

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Lower Quartile Ratio</th>
<th>Median Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elmbridge</td>
<td>14.19</td>
<td>15.17</td>
</tr>
<tr>
<td>Woking</td>
<td>13.95</td>
<td>13.31</td>
</tr>
<tr>
<td>Waverley</td>
<td>13.7</td>
<td>14.67</td>
</tr>
<tr>
<td>Mole Valley</td>
<td>12.63</td>
<td>12.98</td>
</tr>
<tr>
<td>Surrey Heath</td>
<td>11.61</td>
<td>11.87</td>
</tr>
<tr>
<td><strong>Guildford Borough</strong></td>
<td><strong>10.89</strong></td>
<td><strong>11.94</strong></td>
</tr>
</tbody>
</table>
The data shows clearly that GBC were incorrect to say that up to date affordability data was not available and more importantly, that of the local authorities that share a boundary with Guildford Borough, housing in Guildford Borough is actually more affordable than in almost all neighbouring local authorities.

Another indication of Guildford’s relative affordability was provided by an article in the Daily Telegraph. This was about a couple who had been resident in London, but had moved to Guildford so that they could save for a deposit, but who were considering a move back to London. A comparison was made of the costs of living in Guildford or London, including travel costs to work in London, which showed that annual costs in Guildford were lower by an estimated £3,052; about 16% cheaper living in Guildford than in London. This is why people are moving from London to Guildford – and is why if houses were built as per the Local Plan target, they would mostly be bought or rented by Londoners, not by residents of the borough.

Paragraph 4.2.23

This paragraph refers to sufficient housing to meet the needs of the borough’s population – but the proposed minimum of 693 dwellings a year is well in excess of the needs of the borough’s residents. The data used in the SHMA ignored the effect of full time students and so the housing number is very considerably in excess of the needs of the resident population. If this housing is delivered it will cause an increase in Guildford’s population that is considerably more than recent population growth – almost 5 times the rate of population growth during the period between the censuses of 2001 and 2011.

The final part of the paragraph is nonsense “…..ensuring people with a wide variety of occupations in the borough and potentially reducing travel to work journeys.”

Housing proposed in the Local Plan is mostly in the countryside, with about 70% of the housing proposed on land that is currently in the Green Belt. These locations are some considerable distance from employment centers, many of which are located in central Guildford – so journeys to work will increase, not reduce, and congestion will get much worse. This issue is considered in detail in Annexe 2, which shows clearly that building new homes in the countryside will result in many more traffic movements than building homes within Guildford.

Annexe 1

Housing Supply and Demand Balance Analysis in Guildford Borough: 2001 to 2011

As census data is considered by the Office for National Statistics (ONS) to be their “gold standard” this analysis uses only census data. Although data for subsequent years is available, this is based on many estimates and so analysis is more subjective.

Across the borough, during the 10 year period between the two most recent censuses, the number of dwellings in the borough increased by 2,692, an average of 269 dwellings per year. During the same period, the population of the borough increased by 7,482 persons, but a high percentage of these were full time students, aged 18 and over. Some of these students may have been local, but as this was probably a small number, it was ignored. This data is summarised in Table 2, below.

Table 2 Census Data for Guildford Borough

<table>
<thead>
<tr>
<th></th>
<th>2001</th>
<th>2011</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings</td>
<td>53,388</td>
<td>56,080</td>
<td>2,692</td>
</tr>
<tr>
<td>Population</td>
<td>129,701</td>
<td>137,183</td>
<td>7,482</td>
</tr>
<tr>
<td>Students (18+)</td>
<td>7,004</td>
<td>10,727</td>
<td>3,723</td>
</tr>
<tr>
<td>Persons/household</td>
<td>2.32</td>
<td>2.42</td>
<td>0.10</td>
</tr>
</tbody>
</table>
Some of the increase in students would have found accommodation in student halls of residence (for example, the development in Manor Park opened in 2005) it is assumed that about 40% of the increase in student numbers were in student halls of residence, leaving 2,234 to find accommodation elsewhere. The majority of these would have found rooms in privately rented houses, categorised as “Homes of Multiple Occupation”. Assuming 4 students per house, the increase in student numbers would have needed 559 extra houses. The remainder of the population increase, the “permanent” resident population of Guildford, increased by 3,759 people. As the average number of people per household was 2.42 in 2011, a further 1,553 dwellings were needed for this increase in population. So to house the overall increase in population, including students, about 2,112 additional houses were needed – but 2,692 were built. Thus the number of houses needed in Guildford to house the population increase was actually substantially lower than the supply available; so the balance between supply and demand was not responsible for the increase in house prices over this period, when average property transaction prices across the borough almost doubled.

During the financial years 2001 to 2011, average property transaction prices across the borough are shown in Table 2. This includes average and median property prices for transactions in the years shown. In any given year there may be several high priced transactions which distort an average, and so the median price is also given – the median is the mid-range price, so that 50% of transactions were below this price with 50% above. It is a better indicator of the movement of prices than averages. Also shown is the number of transactions for each year.

Table 3 Land Registry Property Prices in Guildford Borough

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Price £</th>
<th>Median price £</th>
<th>Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001/2</td>
<td>218,637</td>
<td>172,000</td>
<td>3118</td>
</tr>
<tr>
<td>2002/3</td>
<td>254,406</td>
<td>199,995</td>
<td>3211</td>
</tr>
<tr>
<td>2003/4</td>
<td>275,070</td>
<td>220,000</td>
<td>3036</td>
</tr>
<tr>
<td>2004/5</td>
<td>294,235</td>
<td>240,000</td>
<td>2851</td>
</tr>
<tr>
<td>2005/6</td>
<td>303,612</td>
<td>246,250</td>
<td>2974</td>
</tr>
<tr>
<td>2006/7</td>
<td>336,925</td>
<td>250,000</td>
<td>3294</td>
</tr>
<tr>
<td>2007/8</td>
<td>381,221</td>
<td>289,950</td>
<td>2867</td>
</tr>
<tr>
<td>2008/9</td>
<td>354,322</td>
<td>250,000</td>
<td>1481</td>
</tr>
<tr>
<td>2009/10</td>
<td>354,198</td>
<td>270,000</td>
<td>2127</td>
</tr>
<tr>
<td>2010/11</td>
<td>414,167</td>
<td>303,000</td>
<td>1916</td>
</tr>
<tr>
<td>2015/16</td>
<td>486,158</td>
<td>391,750</td>
<td>2510</td>
</tr>
</tbody>
</table>

The data in Table 2 shows that prices increased very rapidly from 2001/2 to 2007/8, and that the number of transactions was quite constant, at about 3,050±200. This represented a turnover of about 5.6% of all of the dwellings in the borough (53,388 in the 2001 census). Then in 2008/9, prices fell, and stayed low for two years. If the balance between supply and demand were the only factor influencing house prices this would suggest a huge increase in supply – but this did not occur. It can be seen from this that the balance between supply and demand must have had a minor impact on house prices. In fact, determining factors were the availability and cost of credit, and the demand for housing outside London. Credit was freely available and credit costs (in real terms) were low, consequently house prices increased rapidly from 2001/2 to 2007/8.

Data from Table 2 shows that the impact of the recession of 2008/9 is clear. It interrupted the increase in property prices – but the reduction in interest rates that accompanied this recession, which provided very low credit costs, resulted in property prices increasing again in 2010/11. Credit costs continue to be very low and when combined with the huge expansion in credit from quantitative easing, the price of assets increased sharply. Again, this had little, if anything to do with the supply and demand balance for housing.

This picture of supply of housing exceeding demand across the borough is similar to the national picture. According to an article in the Guardian newspaper6, across the nation between the years of 1997 and 2007, “the housing stock grew by...
10%, but the population only grew by 5%. If house prices were a function of supply and demand, they should have fallen slightly over this period. They didn’t. They rose by more than 300%.

So the issue of high prices is a national issue, not confined to Guildford Borough, and is not solely because of the supply and demand balance. Building more houses to increase affordability within the borough will not have the desired effect. This conclusion (based on data) is at variance with the Local Plan, and shows clearly that the evidence base underpinning the Local Plan is suspect, and that the analysis in much of this data base, especially the West Surrey SHMA, is inadequate.

The cursory analysis above also indicates the severe impact of having an additional 693 dwellings coming onto the housing market. At the beginning of the recession, in 2008/9, there were only 1,481 property transactions across the borough. Adding 693 dwellings to this would create many problems for any existing householders who wished to sell. As new build housing would be attractive to anyone moving from London, and is more expensive than equivalent “used” housing, the average price for housing would probably not fall – but householders would be forced to reduce their selling price in order to sell.

Given that the number of domestic property transactions in 2015/16 was 2,510, adding 693 houses to this mix would mean that redevelopment projects would not proceed. Existing run down areas of Guildford would become more run down – there would be no incentive to revitalise them under this proposed plan. Green field sites outside Guildford would provide the bulk of new dwellings – so large areas of Guildford would simply be left to decay. This is contrary to policies within the NPPF, specifically those policies that protect the Green Belt.

The median price is increasing more slowly than the average price, a clear illustration that the average price is not a good indicator of the housing market, due to the impact of a limited number of high value transactions.

A true picture of the housing market has not been presented in this Local Plan. A more accurate picture (for 2015/16) is given in Table 3, which shows, for example, that there were 183 housing transactions at a price equal to or lower than £200,000 during 2015/16.

**Table 4 Housing Transactions in Guildford Borough, 2015/16**

<table>
<thead>
<tr>
<th>Number of Transactions</th>
<th>≤£100,000</th>
<th>Average of these</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td></td>
<td>£162,577</td>
</tr>
<tr>
<td>183</td>
<td>≤£200,000</td>
<td></td>
</tr>
<tr>
<td>713</td>
<td>≤£300,000</td>
<td>£236,416</td>
</tr>
<tr>
<td>1312</td>
<td>≤£400,000</td>
<td>£288,675</td>
</tr>
</tbody>
</table>

According to other ONS statistics, average earnings for Guildford residents in 2015 was £33,557 per year. A couple, with both on average earnings, using a multiple of 4.5 times earnings, could take out a mortgage for just over £300,000. According to the 2015/16 Land Registry data they would have had a choice during 2015/16 of at least 713 properties. This suggests that the affordability issue in Guildford has been exaggerated in order to promote a pro-development agenda.

**Factors that Affect House Prices and Affordability**

Across the UK, much of the planned increase in house building is related to the issues of high house prices and affordability – building more houses to increase the supply has been the approach adopted by the government, even though this policy is high risk, for example, consider the collapse of the housing markets in Spain, Ireland, etc in 2008/9 as a consequence of their massive house building programmes. There has been no risk analysis associated with the policy, either nationally or locally in the borough. House building appears to have been put in place as a strategy to drive economic growth, so that a great deal of effort (and government subsidy) has been devoted to this policy, to the detriment of other important policies, such as regional and industrial.
Affordability is not just a question of increasing housing supply, it is much more complex and a proper analysis should examine associated questions such as: why have real wages in the UK increased so slowly? Slow growth in wages means that house prices have outstripped the growth in real wages, and so affordability ratios have fallen. A sound, sustainable economy will not be built by housebuilding alone and to pursue this path is to embark on a policy that could well end in ignominious failure, with a housing bust similar in scale to that experienced in Spain and Ireland. But what other factors are important in determining house prices and affordability?

When considering this issue of affordability, and the approach of building more dwellings, there is an implicit assumption that the only determinant of house prices is the balance between supply and demand. But this is a nonsensical assumption. In 2008, when house prices in many regions of the UK (and across the world) started to crash, this was not because of a sudden massive increase in supply. Many other factors were clearly at work. Other factors that are important in determining house prices include:

The cost of credit – the interest rate: effectively this is set by government policy via the Treasury and then by the Bank of England. This has been extremely low for 5 years, and is set to remain low for the foreseeable future. Even before the reduction in the Bank of England rate to 0.5%, the real cost of credit had been low for many years – largely because the governments preferred measure of inflation, the CPI, does not include a measure of housing costs. The current very low cost of credit means that mortgage payments as a percentage of take home pay are lower for first time buyers than during previous property booms of 2005-7 and 1989-90. House prices are set by what people can afford to pay, and so property prices have climbed.

The availability of credit. At the very least this is regulated by government, but in practice it is effectively set by government policy, for example, quantitative easing has resulted in huge credit expansion leading to asset price inflation, including house price inflation. Current high house prices are a direct consequence of the economic policies of successive governments, spanning a period of at least 20 years.

Various schemes to assist buyers such as “Help to Buy” have enabled house builders to increase or maintain prices, so that much of the subsidies government pays ends up as builders profits. This is because, for example, equity loans are available only on new build properties.

Housing subsidies paid by the government. In 2015, about £24 billion was paid out as housing benefit, of which about £8.8 billion was paid to private landlords. Consequently, housing benefit has largely driven the buy to let boom. With a secure rental income, buy to let landlords can bid up the price of houses, beyond the reach of other buyers.

The growth of “buy to leave”, which is driven largely by money from overseas, some of which comes from the black economy and illegal activities in overseas countries. Overseas buyers effectively use a house in the UK (predominantly London and its environs) as a safe deposit box in the sky. This has led to a significant number of properties in London being sold to overseas buyers, who have no intention of living there – but their investment is safe and likely to appreciate in value. In the years 2015 and 2015, Asian buyers alone paid $24 billion for UK property, of which $20 billion was in London. This forces London residents to move out to the suburbs and beyond, pushing up prices across the whole of the south east. Brexit and associated financial instability is likely to have an impact on this, and it may create a downturn in the London housing market.

Taxes – not just stamp duty but other taxes contribute to the high final cost of a house. Taxes and levies on the excavation of raw materials from quarrying coupled with high landfill taxes increase the final cost of every house built, so that stamp duty is just another layer of tax – the icing on the taxation cake for government. What extraction taxes and energy policies have done is force the closure of British brick plants, cement makers, etc, etc. Now that there is a construction boom, building materials are being imported from all over Europe – bricks from Germany and further afield, roof tiles from Belgium, cement from France, etc. This leads to large increases in prices when there is an increase in construction – over the 5 years to 2016 brick prices increased by 25%, cement by 17%. The living wage will increase the pay of unskilled workers, such as labourers. Even in the recent past, a construction boom was a major stimulus for the British economy, but this is no longer the case because so much building material (and workers) are now imported. In 2015, the value of total imports of building materials from EU countries was £4.9 billion.
In addition, the Landfill Tax ensures that land is not used efficiently – it is cheaper to build large surface area car parks than to excavate and build car parks underground so that even when multi-storey car parks are built, they generally have no basement – because of the high cost of excavation due to high landfill taxes.

Guildford town is a classic example of inefficient land use, with large surface car parks at the university; park and ride car parks, at the railway station, and at employers throughout the town. This is a grossly inefficient use of land, but this inefficient land use is a consequence of government policy.

Profit margins of developers, which are currently somewhere between 20 to 30% on the cost of a house, even after high, exorbitant salaries are extracted from the companies for company executives.

As an example, Berkeley Homes has in place the most generous bonus system ever put in place by a British company, with £1 billion due to be distributed to company executives if certain targets are met – and the company is en route to meet these targets, mainly because of its ability to set and maintain high house prices. The chairman of Berkeley Homes was one of the highest paid persons in the UK in 2015, with his benefits amounting to more than £22 million for the year.

Profit margins enjoyed by housebuilders would not be tolerated in government regulated industries such as utility companies, or in food retailers, etc. It applies to the most expensive purchase the vast majority of purchasers will ever make, and it shows clearly that the housing market model used by the government (supply by the private sector only) is working only to benefit developers. It is functioning as a free market – but it is not a true free market because of the other factors that determine house prices such as government subsidies, including housing benefit. These create a win:win housing market for developers. The ability of developers to control housing supply is a major problem with the housing market – it is not the planning system that limits the supply of new dwellings, it is developers ensuring that they can maximise their profit margins by drip feeding new builds onto the market. The Local Government Association stated that there are potentially 400,000 dwellings with planning permission but construction had not been started. So the problem is in the operation of the market, not in the planning process. Reforms to the way that the housing market operates are long overdue, for example, through a large social housing programme, managed by a national housing executive.

Government regional policies also have an impact on house prices. This is evident in the way that property prices have or have not recovered after the property price crash in 2008. Not all regions currently have higher house prices than their 2007 peak values: This is clear evidence of an ineffective regional policy, and shows the publicity around creating a “northern powerhouse” is hyperbole. One strand of an effective regional policy would ensure that a genuine free market was allowed to run its course, so that as building in London and the south east became more difficult and expensive (due to strong planning policies protecting the Green Belt and countryside) development would be pushed to other regions, ensuring these regions grew. Instead, the government seek to make it easier for developers to build in areas with the highest growth, by weakening planning policies, so that development is concentrated in London and the south east, especially in the countryside. The effect of this policy (in reality the lack of an effective regional policy) means that demand for development of all types continues to grow in and around London, so that house prices can be increased and controlled by developers. This increases the wealth gap between the London plus the south east and other regions, and limits employment growth in these areas.

Immigration has a major role in the supply and demand equation – if the rate of immigration were not so high, the demand for housing would be substantially lower. Migration Watch have estimated that at least 40% of the housing demand is due to immigration, but their estimate was based on a lower number of migrants than the current level of immigration, and does not include the impact of the children of migrants, nor does it include the demand from illegal immigration. Thus the government’s immigration policies have had a major impact on the demand for housing. Immigration also has an impact on pay – it helps keep pay levels low, so that employers are not forced to pay more to help with recruitment. This has an impact on affordability ratios. Although there is a construction boom, with a supposed shortage of skilled workers, pay within the construction industry has not increased as rapidly as it has done in the past. This is because employers can recruit immigrants, who will work for lower rates of pay, for example, 50% of sub-contractors working for Berkeley Homes are from eastern Europe. So not only does this policy have an impact on the supply part of the housing equation, but it also has an impact on the ability to afford housing by keeping pay rates lower than they would otherwise have been. A recent estimate by employers was that pay rates for skilled workers in construction have increased by 6%. Historically, this is a very low increase for pay rates in the middle of a construction
boom. If immigration policies change as a consequence of the Brexit vote, the pressure placed on housing supply by immigrants will fall, and this should be reflected in revised housing policies.

Annexe 2

Contribution to Traffic Movements and Air Pollution

The Local Plan proposes building a minimum of 693 houses per year, of which 2,400 (17%) will be built within Guildford. The remainder (83%) will be built in the countryside. This is very much against advice from the Institute for Air Quality Management. Intuitively, it seems likely that this spatial distribution of housing would increase car and van journeys with a consequential increase in air pollution that is related primarily to vehicle emissions. This paper examines statistical evidence to assess the impact on vehicle journeys within the borough.

Spatial Vision

The spatial “vision” proposed in the Local Plan is the reverse of that recommended by the Institute for Air Quality Management, who said8

“The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase road traffic.

This report also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done within the borough. This is despite requests to the council to set up an AQMA following air quality tests that show high pollution levels in at least one village which has high traffic levels.

Sustainability

To examine the claim that the draft Local Plan contributes to sustainability several areas could be analysed. One of these is the impact on traffic, to assess the impact of adding additional housing in the countryside rather than in Guildford centre. This can be gauged by comparing the likely impact on car ownership of building housing in a rural location as opposed to an urban area of Guildford. Effingham has been chosen for this, but it could be any of the rural villages in the borough, and the impact of additional housing in this village is compared with additional housing in an urban area, Walnut Tree Close/Station area. This can be done using census details, taken from the Office for National Statistics (ONS) publications, so that availability of cars and vans can be compared as well as methods of travelling to work.

What have traffic levels to do with sustainability?

Traffic is a major contributor to air pollution, and air pollution has a significant effect on health. In April 2014, Public Health England produced a report9 that reconfirmed the estimate by the Committee on the Medical Effects of Air Pollutants that approximately 29,000 deaths per year in the UK could be caused by pollution from man-made particulate matter. This report estimated that there were 55 deaths per year in the borough attributable to air pollution. Particulates are very small air borne particles and transport is the single largest contributor to particulate pollution.

But air pollution is not limited to air borne particles - it includes many other pollutants, and one group that affects human health, especially that of children, is the gaseous oxides of nitrogen, nitrogen dioxide (NO2) and nitrogen monoxide (NO). When taken together these are usually called NOx. Nationally, almost half of these gases are produced by
transport. In a submission to the House of Commons Report “Action on Air Quality” published in November 2014, Dr Ian Mudway of King’s College, London said:

“We have also found effects on infant mortality rates, on pre-term birth and on cognitive performance in children. There is some interesting data emerging on traffic proximity, diesel emissions and traffic potentially autism spectrum disorders… The evidence over the last three or four years that children growing up near traffic in areas with high NO2 and primary particle emissions have stunted and impaired lung development is incredibly strong.”

As well as health aspects, road safety is also important – increased traffic levels means more congestion, more delays, more stress, and inevitably, more accidents.

Conclusions

The spatial planning in this draft plan will increase traffic movements and consequently, air pollution. Air quality should be a constraint used to limit the housing target. Even with a lower housing target, instead of what is proposed a higher proportion of housing developments should be within Guildford town. This could be achieved by recognizing that an expansion in retail and warehousing and distribution within the urban area is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality, with proposals to reduce noxious emissions, for example, through the use of LPG fueled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 24,000 cars and vans to those already in use within the borough, based on car ownership levels in a rural village and an urban area in Guildford. This is the approximate number of vehicles that the proposed housing additions would bring, thought his number would vary, dependent on where the additional houses are located. If all the proposed housing were within Guildford, then instead of 24,000 about 13,000 cars and vans would be added to the existing total. In the census of 2011, the total across the borough was just under 54,000 cars and vans.

The comparisons made above show that traffic and air quality has not been considered in the spatial allocation of housing. Sustainability claims have not been analysed in drawing up the housing proposals featured in the draft Local Plan. A simple comparison of only one aspect of sustainability, car use (with its associated air pollution), shows very clearly that building extra housing in Effingham (a typical rural area village) is the least sustainable option. As a method of travel to work, car use in Effingham was shown to be much higher than in an urban area of Guildford, so to limit increases in traffic and emissions from traffic, housing should be provided in areas closer to employment opportunities and with access to good public transport. This does not mean that no additional housing should be provided in the countryside, but this housing should be limited in quantity, in keeping with its Green Belt status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1119  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

1. I object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.
2. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.
3. In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

4. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

5. GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11379  **Respondent:** 8865537 / P Waldner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2339  **Respondent:** 8876673 / Tony Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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**Section page number:** Page 92 of 322  **Document page number:** 539
Policy H2 Affordable Homes

I OBJECT to the idea that the Plan will meet the need for affordable homes. The homes that will be built by developers on the land released by the Plan are unlikely to be genuinely affordable even if sold or let for less than 80% of market value. The plan will result in large houses built on Green Belt land which will be occupied by wealthy commuters since it is the large houses that make profits for developers. There is no meaningful policy to build council owned homes nor to make land available to housing associations. I agree that there is a real need for affordable homes for key workers throughout the Borough but this Plan will destroy our environment without providing the affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15887  Respondent: 8878337 / J.R Lukey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Builders build bigger houses because they make more money on them, what we need is more affordable housing but in an area that is already bursting at the seams.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/657  Respondent: 8879937 / Dietlinde Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23). The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”. The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” So the developer doesn’t even have to provide any affordable homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11592  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11152  Respondent: 8886945 / Brian Osborn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to Policy H2 Affordable Homes or that this Local Plan addresses building affordable housing for local need. Current guidance on producing SHMA’s lacks a meaningful needs-based definition of affordability - such as for example the proportion of income allocated to housing costs. OAN figures alone therefore cannot tackle affordability or need (defined as a basic human need to have a roof over our head). I believe that a more meaningful approach to addressing local need is through Neighbourhood Plans and local land trusts. They provide a mechanism to meet local need while preserving and enhancing villages characters. We need local planning that works with local communities. The bottom up approach of Neighbourhood Plans rather than the top down approach of SHMA with an OAN figure incompatible with genuine affordability is a more realistic approach to addressing local need.

Moreover, a recent Rural Housing Needs Survey commissioned by Send Parish Council in 2013 found that “local need” was relatively low within Send Parish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14185  Respondent: 8887009 / Jacqueline Weller  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy H2 - I object to the percentage of affordable homes being proposed, in particular the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT because "Affordable Homes" by their very definition, means those sold or rented at 80% of market value which, given the high value of land in West & East Horsley, will effectively mean they are UN-affordable. Inevitably, the building of such homes is effectively a placebo to developers who will be 'here-today' and 'gone-tomorrow' with absolutely no concern for the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation
through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16963  Respondent: 8893057 / Dianne Garnett  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 We object to policy H2 Affordable homes.

1.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. 1.3 In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

1.4 We question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

1.5 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**13. POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/14750  **Respondent:** 8896161 / Carol Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY H2: Affordable homes**

I agree with the need for affordable housing, but I OBJECT to the high volumes and high densities proposed in the West Horsley areas.

The affordable homes will be too expensive for key workers and so we need some social housing provided by the Council for rent, preferably near to workplaces to minimise cost of transport..

I object to any affordable homes being built in the Green Belt or elsewhere which are built to enable other market priced houses to be built in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4424  **Respondent:** 8897377 / Jan Jewers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

18. I object to the lack of real affordable homes in the Local Plan, GBC should be building ‘counsel homes’ for rental to young people/families

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8041  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular, a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford’s relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly, no amount of affordable housing will ever meet demand.

In addition, the definition of an ‘affordable home’ is 80% of market value. With even a 2-bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4121  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

13. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some
allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/8149  Respondent: 8902465 / Linda Slater   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):
- Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK.

People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16951  Respondent: 8902689 / Lyndell Mussell   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

AFFORDABLE HOMES

In my view the Local Plan appears to be balanced in favour of further development at any cost to the residents. What are the alternatives? Is the Local Plan consistent with current and future ecological and environmental projects? Are the economics against serious residential development? Houses in Guildford are priced at around £300,000. Who can afford these prices with the present level of inflation and declining real income growth? In addition, if interest rates start to rise in the future are we not fuelling another housing crisis in the Borough.

Even some rented properties require a combined income of around £40,000 before being accepted. If affordable homes are 70% or 80% of market rents, the demand for this accommodation may be limited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18530  Respondent: 8903265 / Susan Anderson   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 101 of 322
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy H2 planning a significant volume of social housing to be built in areas in which it is not needed, in sizes not equating to the strongest demand and not close to areas where tenants or owners of such properties have employment. To build them where the housing stock is high value only means that these affordable homes will be bought up and sold on for a profit quickly, meaning that his stock will be lost to the community that needs it.

I trust that these objections will be fully considered and in particular that the former Wisley Airfield (Three Farms Meadows) is removed from the Local Plan with immediate effect, and the changes in Green Belt status to the villages of East and West Horsley be also removed from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
In addition, whenever any building work is done it seems to be for luxury houses and not affordable houses anyway which then take up the space that could be used for affordable housing. Local people in the Horsleys should be given priority for any housing built in the area; building work should not be taking place in this area to accommodate an overflow from Guildford where, for example, the University of Surrey have not built the accommodation previously promised and allowed, thereby causing students to take up housing in the rest of Guildford etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Any proposal by Surrey University should not be considered until they use planning permission already obtained. If they were to do so, this would have a significant impact on meeting housing requirements in the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18437  Respondent: 8909761 / Diana Grover  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16108  Respondent: 8911617 / Charles Hope  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

"Affordable housing" in an area where house prices are well above the Borough Average means that such housing is unlikely to attract Key Workers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is ridiculous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

If the developer simply builds the development they want and then makes a cash payment to the council for the affordable houses the developer does not build, how does this help Guildford Borough Council build affordable housing? This would appear to prejudice the younger generation and those needing this urgently sought type of housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9448  **Respondent:** 8915073 / Alastair Lawson  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I agree with this policy – but it is open to abuse by developers as it eats into their profit

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13241  **Respondent:** 8919009 / Andrew Kukiela  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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And at what point will ‘affordable homes’ be able to go onto the market at full market price?
As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY H2 – Affordable homes OBJECT. East Horsley has the lowest demand for affordable housing in the borough. Putting 1-bedroom homes in an area where there is virtually no demand is flawed. These properties would represent a great opportunity to East Horsley residents to buy and re-sell at a profit or simply rent out at a high profit. Not the intended purpose. There are also very few employment opportunities in East Horsley so new owners/tenants would be required to travel to work with adverse effects on road usage and the environment. The best place for starter homes would be in the centre of a Guildford where there are more jobs and less need to travel to work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I support the general idea that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed. GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. As East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement –a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector. Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings. As a result of this policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location. In an area such as East Horsley this is likely to result in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/17837  **Respondent:** 8920129 / Allan Siva  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences for villages such as East Horsley, which is the area with the lowest demand for affordable housing in the borough. The affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

**I therefore OBJECT to Policy H2**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11991  **Respondent:** 8921377 / Paul Maycox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECTION to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford’s relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13239  **Respondent:** 8921857 / Claire Kukielka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15918  **Respondent:** 8922401 / Ken Harrap  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

There is a need for affordable housing and for downsizing accommodation for the elderly retired. Both need to be centrally located, not in the outer areas of the borough, necessitating travel to work, schools, clinics and shops on a very inadequate transport infrastructure, or alternatively by private car leading to yet more gridlock on roads leading to the centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15135  **Respondent:** 8926529 / Annie Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

There is a need for affordable housing and for downsizing accommodation for the elderly retired. Both need to be centrally located, not in the outer areas of the borough, necessitating travel to work, schools, clinics and shops on a very inadequate transport infrastructure, or alternatively by private car leading to yet more gridlock on roads leading to the centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy H2 - Affordable Homes

I object that developers can be released from their obligation to provide affordable homes (clause 4.2.40). If planning permission is granted to include affordable homes, that must be enforced to ensure the developer provides them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16997  Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Affordability

I strongly object to the way in which the term “affordability” is built into any of the housing projects outlined in the plan. This is completely the wrong term to use in context of most of Guildford Borough. Unfortunately because of its proximity to London and the fact that the Borough sits in some of England’s most beautiful countryside, property prices are extremely high. It is useless stating that affordable home must be included as part of the proposed developments. The definition of affordable in this context is 80% of market values. An example. In our village four semi-detached small 3 bedroomed houses have been built, close to the station, (great for commuters) small (suitable for a young family or downsizers). Ideal you may think – just what we want to see. These houses were over £700,000. This is extremely expensive by most people’s standards. Apply the 80% rule – this is £560,000. Do you call this affordable? Of course not - 80% of very expensive is still very expensive and completely unaffordable to the very workers you are aiming them at. Our Schools, hospitals, doctors’ surgeries and other workplaces where we need key workers all have difficulty recruiting staff because they cannot afford to live in the Borough. Other firms have some difficulty in apparently retaining some staff because of the price of housing in the Borough. There is absolutely no doubt that Guildford needs more dwellings for key workers and people who are looking to start their way on the housing ladder. It is also desirable to have suitable housing in the villages for young families and for those who wish to downsize. But these dwellings must be genuinely affordable – not using the government definition as it does not work in our area.

Part of the economic plan for the Borough seems to be to create more retail space, warehousing and distribution centres as well as other business opportunities. Employees of many of these work places are relatively low paid workers. Why are we creating all this sort of employment without suitable housing for the working people and their families. What we need is social housing or housing association housing which our young people and key workers can really afford. Downsizers in the main will be able to afford whatever is built because they will be trading in a more expensive home.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/59  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2: Affordable Homes
We support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

**EHPC accordingly OBJECTS to Policy H2.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/4462  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<tr>
<td>1. POLICY H2</td>
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In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.
In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17702  Respondent: 8930305 / Elaine Best  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy H2: Affordable Homes which is flawed and misled. The real cost of “affordable homes” in the Horsley area is likely to be much greater than the probable reach of affordability for key workers. I also note that your intention for business development is on the opposite side of the Borough to West Horsley which, with the transport links, makes no sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5487  Respondent: 8930465 / Michael & Carol Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We need a LOW COST housing scheme in all small villages to encourage young people to settle or be able to stay in the community where they grew up. I would see no problem whatsoever with each village in the Borough having to provide LOW COST housing - say 20 houses per village. This would be sustainable and would certainly meet the housing needs with in the Borough over the next 20 odd years or so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8757  Respondent: 8933185 / Peter See  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2.33 Policy H2: Affordable Homes
reducing: reduce

**Objection** to inadequacy of Policy H2 and its supporting text.

Although the Local Plan has ‘4.5 Design Policies’, it does not have a strong policy which ensures that good standards are followed for various aspects of affordable homes. This is regrettable as there is a need for a strong policy to take into account the risk of increasing numbers of problems. These could be caused by more and more affordable homes which do not completely look after their occupants or fully take into account the need to retain the pleasant character of an area.

A Policy should include the need for affordable housing to be in keeping with other development nearby. If a number of homes are to be erected, they should vary in design in order to be pleasing to the eye. In the past a number of affordable homes have been provided which are not in keeping with others nearby and which are too plain.

The Council (with housing associations etc) should not 'impose' housing on towns and villages, if the affordable housing is of poor exterior design, with inadequate living space and inadequate gardens (and without driveways and convenient and secure garages for parking cars or bicycles). The elderly and disabled people in particular need driveways for cars. It is not always possible, for example, to provide numerous Disabled Parking Bays on a road. See 4.2.8 on page 7 of this letter.

High standards are needed, even though high standards may mean fewer properties are provided. Otherwise, the high numbers of affordable homes planned could completely spoil the character and amenity of parts of the Borough, cause significant problems for the people living in their affordable homes, and cause problems and costs for the general community.

I think that it would be more realistic to say up to 40% must be affordable. On the west side of the Borough, there are already large areas of affordable housing in Ash and in Hampshire at Aldershot and Farnborough.

Page 41 Monitoring Indicators

It will be interesting to see what your monitoring shows. The provision of affordable homes seems to be too complicated with significant costs for the Council, tax payers, developers and the occupants of new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Average flat prices in Guildford are £280,000 according to Rightmove (semi-detached over £470,000). Affordable is defined as 80% of purchase price. We do not feel this is affordable. Even if 70% of new builds are reserved for rental, the rent is unlikely to be affordable.

FLAG also objects to the viability clauses that appear after the policy, although we recognise that this has been tightened somewhat following earlier consultations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8. Policy H2 para 4 needs to include that any funds paid in lieu of affordable housing should be ringfenced and the wording further tightened by replacement of “expect” by “will enable”

21. I object to the wording of policy H2 specifically “we will also seek” and “we will seek”. This should be replaced by the use of the verb “require” in this para and throughout the document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7466  Respondent: 8947649 / Barton Willmore (Huw Edwards)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. Draft Policy H2: Affordable Homes

Draft Policy H2 requires that on sites providing five or more homes, or sites of 0.17ha or more, that 40% are to be affordable. The 'reasoned justificat ion', for this draft policy states at paragraph 4.2.35:

This policy applies to all new homes within the C3 Use Class. This generally includes retirement homes, as well as self-contained studio flats for a single household, whether specifically aimed at students or not. It does not apply to residential institutions such as care homes and nursing homes. Assisted living and other sui generis residential developments may be required to make provision; these will be considered on a case-by case basis.

We object to this draft policy as currently drafted since it does not take into account the viability or provide certainty for emerging models of accommodation and care for older people, such as the presently proposed development of the Site. The draft Policy is therefore not considered 'Effective ' in this regard, and therefore fails this test of "soundness".

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

This is a structural issue which affects the delivery of assisted living accommodation for older people at a strategic level. Not looking to achieve parity of affordable housing provision between specialist and mainstream developments is essential to supporting efforts to boost the supply of housing in this sector in line with both national and local priorities. Owing to the further increased costs of redevelopment on previously developed sites, it is therefore considered that Policy H2 should not apply to assisted living developments on previously developed land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9365  Respondent: 8948385 / Gillian Eve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy H2: Affordable Homes

I OBJECT. Whilst the aim of providing affordable homes appears laudable, in practice very few genuinely affordable homes will be made available. Property prices in the borough are so high that so called "affordable houses" - 80% of market value - will be beyond the reach of those who genuinely need affordable housing.

Furthermore, the developers will take full advantage of the "viability" clause, which means they can be exempted from providing the required level of "affordable" homes if it is not deemed profitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16152  Respondent: 8948385 / Gillian Eve  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2: Affordable Homes

I OBJECT. Whilst the aim of providing affordable homes appears laudable, in practice very few genuinely affordable homes will be made available. Property prices in the borough are so high that so called “affordable houses” – 80% of market value – will be beyond the reach of those who genuinely need affordable housing.

Furthermore, the developers will take full advantage of the “viability” clause, which means they can be exempted from providing the required level of “affordable” homes if it is not deemed profitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2504  Respondent: 8948385 / Gillian Eve  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2: Affordable Homes

I OBJECT to the changes, which do not go far enough to ensure that sufficient genuinely affordable or social housing will be made available where it is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17297  Respondent: 8967233 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Luke Vallins)
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The University broadly supports the policy on provision of affordable homes.

However, the University is concerned by the deletion of the text at the start of the second paragraph that the provision of affordable housing is subject to viability. The University considers that it is important that this test is explicit in the wording of the policy given the importance of viability in development decisions, in addition to its consideration in the supporting text to the policy (paragraphs 4.2.38 – 4.2.44).

The University considers that the policy, as drafted, is therefore not consistent with national policy. For example, paragraph 173 of the NPPF explains that “To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

The University therefore considers it necessary for viability considerations to be reintroduced into this policy as follows:

“Subject to viability, these affordable homes will be provided:…”

The University considers that the requirement for 40% affordable housing provision is set at a more appropriate level when compared with the requirement of 45% for greenfield developments as set out in the draft plan, and is likely to be more reflective of viability.

The University notes that the policy requires affordable homes to be provided on site of 0.17 ha or more. The University does not consider purpose built student accommodation schemes are suitable to attract an affordable housing requirement and considers it important for this to be clarified in the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As set out in our representations to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2016), we would still question the percentage of affordable housing proposed in which could render sites unviable and undeliverable. Policy H2 states ‘we will also seek affordable homes on sites providing five or more homes, or sites of 0.17 hectares or more regardless of the number of homes. We will seek at least 40 per cent of the homes on these sites as affordable homes’.

As set out in our previous representations, the viability of residential developments is an important factor that should be taken into consideration when determining the level of affordable housing provision set out in a Local Plan. This matter is strongly supported at paragraph 173 of the Framework which states:

“To ensure viability, the costs of any requirements likely to be applied to development such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable development to be deliverable”.

In the context of paragraph 173, we would question the requirement of at least 40% of affordable housing. We also consider that Policy H2 needs further clarity to identify if self-build and custom housebuilding plots will be taken into consideration when calculating the requirement for affordable housing.

The changes to Policy H2 now allows for affordable housing contributions to be provided off-site, or by payment in lieu where the Council agrees that on site provision and management would be impracticable due to size and/or location and this is welcomed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy H2: Affordable homes

I OBJECT to this policy

“Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy H2 sets out the Council’s proposed policy in relation to seeking Affordable Homes.

The Council will be aware that Planning Practice Guidance (Reference ID: 23b-031-20160519) states that:

“There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014 and should be taken into account”.

These circumstances include that:

“Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm”.

The proposed five unit threshold in the Policy is, therefore, not consistent with national policy.

We welcome the recognition in paragraph 4.2.40 of the Local Plan that circumstances may mean that prescribed levels of affordable housing may not be achievable for viability reasons, and that this may require a change in the mix and/or overall levels of affordable housing in a proposal. To ensure that Policy H2 is deliverable, it is our view that this wording should be included within the text of the policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17141</th>
<th>Respondent: 8993793 / Berkeley Homes (Southern) Ltd.</th>
<th>Agent: The Howard Partnership Trust (Vicky Lochead)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
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</tr>
</tbody>
</table>

The Council will be aware that Planning Practice Guidance (Reference ID: 23b-031-20161116) states that:

"There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014 and should be taken into account”.

These circumstances include that:

"Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm".
We acknowledge paragraph 4.2.40 of the proposed Local Plan that indicated a level of flexibility when it is demonstrated that the contribution would adversely impact the sites viability. To ensure that Policy H2 is deliverable, it is our view that this wording should be included within the text of the policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/119  Respondent: 9009153 / Lindsay Mitchell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 

I object the change in policy on affordable homes (Policy 4.2.23) 

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a disgraceful sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents:

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Comment ID: PSLPP16/8667  Respondent: 9050337 / Nigel Geary  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover,
the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough in an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

In summary then, I object to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/11426  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY H2 – Affordable homes**

OBJECT. “Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1843  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.
This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18554  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Charles Collins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2: Affordable Homes

Object (not justified nor positively prepared in respect of NPPF paragraph 182)

In order for the policy to be effective, it would need to be achievable. WPI has concerns that the draft policy is not sufficiently flexible or based on an understanding of the available evidence base. The draft policy fails to have regard to NPPF paragraph 182.

The NPPF is clear on the need for ‘competitive returns’ to enable a willing landowner and developer to proceed with development. Value is clearly linked to the planning system, and hence the level of affordable housing is clearly a relevant factor. Viability is recognised in the GBLP in draft paragraphs 4.2.38 to 4.2.41. The viability clause should however be included in the policy.

The Guildford Local Plan Viability and Affordable Housing Study (2014) was produced by PBA, and has been used to support a 40% provision, on sites of 5 or more units, such as Wisley Airfield. WPI does not wish to scrutinise this evidence in any great detail. Various suggested amendments to the approach proposed were made by WPI with respect to representations on the emerging Community Infrastructure Levy (CIL) Charing Schedule, in 2014.

WPI does however wish to note that, to be effective, draft policy H2 should require a ‘target’, consistent with overarching affordable housing policy. Numerous Inspectors’ decisions have supported the use of a target, rather than set level of provision.

The draft policy also specifically outlines a tenure requirement of 70% social rented. This is prescriptive and likely to be out of kilter with national planning policy. It cannot reflect, for example, the recent imposition of starter homes included in the Housing and Planning Act 2016.

Finally, the draft policy requires that land for affordable housing be provided at nil value, in other words, that the landowner and various market components of a development proposal further subsidise the provision of fee and serviced land, on a net developable basis. This is uneconomic and unlikely to meet the NPPF requirements. The Guildford Local Plan Viability and Affordable Housing Study (2014) is not based on an assumption of nil land value. Paragraph 5.3.10 outlines that a discounted transfer value was assumed in the appraisal, of 55% to 65% of open market value. This is assumed to be based on sales value. The methodology does not state that land was transferred at nil cost.
### Changes Sought

In respect of affordable housing, the plan clearly includes a policy target. This should be reflected in the Vision. The following amendment is therefore suggested:

"Affordable housing will account for approximately 40% of all new housing and provided on all appropriate sites"

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Policy/Section</th>
<th>Original Changes requested (July 2016 Representation)</th>
<th>Understanding of changes shown in the Focused Amendments (June 2017)</th>
<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy H2: Affordable Homes Page 38</td>
<td>The draft policy should require a ‘target’ of 40% affordable. A clear viability clause is required within the draft policy wording itself. Add <strong>“In seeking affordable housing, where the full target provision cannot be met, the Council will assess a scheme viability”</strong></td>
<td>(Pages 44-45) The revised policy refers to an “at least” requirement rather than a “target” requirement. No viability clause has been added to the policy, nor has the proposed additional text. Instead, stricter requirements are included regarding off-site contributions in lieu of on site affordable housing provision. There are</td>
<td>Clarification Requested (Objection maintained). The policy is unlikely to be effective with regard to affordable housing requirements and viability. Clarification Required (Objection maintained) as the matter of tenure split remains too detailed for a Local Plan Policy and</td>
</tr>
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</table>
including assessing the overall mix of affordable, unit size and tenure”

The supporting text, rather than the policy, should refer to any tenure split requirements, though the detail would be best left to supplemental guidance, based on the relevant SHMA or other housing needs evidence. The GBLP must be consistent with the Housing and Planning Act 2016 and anticipated further guidance/ Regulations.

Delete the reference to nil land value within Policy H2. This is uneconomic, and unlikely to meet the NPPF requirements. The Guildford Local Plan Viability and Affordable Housing Study (2014) is not based on an assumption of nil land value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7051</th>
<th>Respondent: 9094753 / D Jones</th>
<th>Agent:</th>
</tr>
</thead>
</table>

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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?
As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/514  **Respondent:** 9241793 / Nicky Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **I object the change in policy on affordable homes (Policy 4.2.23)**

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4486  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.
It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14940  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Affordable homes – I OBJECT. “Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10633  Respondent: 9335041 / David Reeve  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2: Affordable Homes

I have sympathy with the sentiment of this policy, but I OBJECT to the notion that an increase in housing provision will have the desired effect. In its practical effects this policy is most unlikely to resolve the major problem facing many families or young people wishing to find a home (for purchase or rent) in Guildford – namely affordability.

Guildford is an expensive town in an expensive region within easy commuting distance from London, one of the most expensive cities in the world. No practicable degree of growth in local housing supply will result in lower prices; there is an effectively inexhaustible supply of buyers with sufficient funds to outbid a large proportion (almost certainly a large majority) of families and young people in the housing market. Moreover, the relatively buoyant buy-to-let market (stimulated in part by student demand) means that market rents remain high and out of reach to many renters without the assistance of housing benefit. Indeed, this same point was made by Edge Analytics in paragraph 3.6 of their Draft Strategic Housing Market Assessment – A Review, March 2014, in which they stated that “Whilst it is evident that
Guildford Borough has a particularly acute affordability issue, it is less clear how an upwards adjustment to housing provision would manifest itself as an improvement to the affordability position.

In practice this problem cannot be solved by a Local Authority by increasing the supply of affordable homes (ie. by definition 80% of the market price). It can only be addressed by a consistent, long-term, national policy that would include an increase in the provision of social housing (ie. council housing) and potentially a degree of rent control in addition to an increased supply of housing.

In the absence of such a national policy (and the political will to sustain it in the long term), a misguided attempt to greatly expand housing provision in Guildford would simply put additional pressure on development in both urban and rural areas of the borough, on traffic congestion and on other infrastructure, and would not address the fundamental problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2630  Respondent: 9335041 / David Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT – regrettably – (on 3 distinct grounds)

I support the aspiration of promoting homes that are affordable for those in housing need – but this policy will not help many of the borough’s residents who are in most need of assistance. Land and housing prices in this part of Surrey, even when discounted to 80% of their market values, will remain well out of reach of many residents. An initiative is required to build social housing on Council-owned land in order to enable larger numbers of lower-paid and younger residents to rent their home at a price they can afford without requiring the support of housing benefit (which currently costs the UK almost £28 billion per year). On the contrary, this policy – while consistent with national policy – will simply exacerbate the house price problem, because developers will recoup the 20% discount on the 40% of the “affordable” units by simply increasing the price of the remaining market units. Built-in house price inflation!

In paragraph 2 of the Policy, the word “seek” should be replaced by “require” in both places where it appears.

Similarly in paragraph 4.2.39, the word “expected” should be replaced by “required” wherever it appears.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5869  Respondent: 9412065 / Stephen Bray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

H2 - Affordable homes:

With both a young adult son and ageing friends and relatives, I absolutely support this policy from both ends of the spectrum - to see a minimum of 40% affordable homes being provided as part of a substantial housing development, and
70% of those being made available for rent, would I feel very much serve the need for local youngsters to stay in West Horsley and for the older generation to downsize and stay in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1016  Respondent: 9444929 / Markfield Investments  Agent: Turley (Donna Palmer)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2.34 The Policy seeks sites of 5 or more homes, or 0.17ha or more, to provide at least 40% affordable housing. There is a significant need for affordable housing in the Borough and this is supported by the Council’s evidence base. A Local Plan and CIL Viability Study (October 2016) has been prepared by Peter Brett Associates on behalf of the Council. The Study concludes that:

“Based on the assessment of the policy requirements within the Guildford Borough Proposed Submission Local Plan (June 2016) review, it is considered that the current Plan would not unduly burden the delivery of residential and non-residential development in Guildford borough.”

2.35 No updated assessment has been undertaken to support the current Local Plan consultation and the revised policy requirements. This is considered to be a significant flaw particularly in light of the proposed additional requirements in respect of accessible homes and custom and self-build housing. An updated Study should be commissioned to ensure the proposed policy is justified and effective in light of the revisions proposed to the Local Plan under the current consultation.

2.36 In addition, it is considered that flexibility should be introduced to the proposed policy wording to allow for site specific circumstances where the proposals may be rendered unviable by the level of affordable housing sought. This is particularly likely to be the case where there are non-standard infrastructure requirements to support the development or potential contamination on site. The policy wording should therefore be updated to require provision of at least 40% affordable housing, subject to viability. It is noted that such a mechanism is advocated in paragraph 4.2.40 of the supporting text but not reflected in the policy wording itself.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10549  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.
It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7097  Respondent: 10615137 / Nav Nair  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan suggests creating affordable homes. I’ve not seen any evidence on how this will be managed and struggle to understand how it would work, economically and commercially. Affordable homes will most likely be taken by people moving into the area, mostly likely from London. The expectation that this enables local people to downsize or move is wishful thinking. In addition, I hope there is legislation to prevent the character of the village being transformed by housing blocks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/230  Respondent: 10616321 / Petrina Jeffreson  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for
not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12677  **Respondent:** 10619169 / Wendy Critchlow  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2471  **Respondent:** 10638209 / Wendy Rockhill  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”
WE NOW KNOW that if the developer doesn’t even have to provide any ‘affordable’ homes, simply to make a negotiated payment to the Council, this is highly unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is shocking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8215  Respondent: 10662849 / Garry Walton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2 – Affordable homes

I OBJECT. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes would be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed might influence the market in more remote parts of the UK, but not here.

This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/450  Respondent: 10701537 / Ben Gamble  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object the change in policy on affordable homes (Policy 4.2.23)
The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.
The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”
So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.
Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5193  Respondent: 10720833 / S Bryon  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO NO CASE FOR DISABILITY CARE OR AFFORDABLE HOMES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/215  Respondent: 10731937 / Carol Mullan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)
The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.
The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”
So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.
Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.
I believe there is far too much financial motivation behind Surrey County Council’s plan - and not enough interest in real wants and needs of the people who already live in and pay rates to the county.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4177  Respondent: 10742945 / Trevor Brider  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

10. The West Horsley Parish Council and Surrey Community Action Housing Survey May 2014 identified a limited need for only around 20 affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/596  Respondent: 10756961 / Carol Marsh  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the lack of a balanced and sustainable strategy combining development and conservation and providing affordable housing for local people

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/371  Respondent: 10758625 / Sarita Schmid  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I feel that I must write to complain about the new local plan and more specifically about the potential changes to the villages of East and West Horsley and the impact the changes will have. The villages are already large in size with the existing population already putting strain on current services. The Raleigh School is desperately hard to get into…as is the local doctors! It is impossible to park at Horsley train Station during commuter times. In addition to that we have a situation, certainly in West Horsley where 2 of the 3 routes into the village flood and become impassible in heavy rain…..more traffic is simply unsustainable. I do appreciate that there is a need to provide additional housing. My main concern is that it is affordable housing that is needed.…..that ordinary people can have a hope of buying. These planned developments are all from greedy developers who won’t be happy unless they are charging at least half a million pounds for a house. Cheap for this area – yes BUT definitely not affordable housing for the majority of the population!! The only people that will be able to afford this kind of housing are commuters moving out of London having already made a killing in the property market. No provision at all for local youngsters who have grown up in the area but have no chance of ever
owning a house here. If we are to have some new houses they MUST be affordable and limited in scope to minimise impact on services and the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12247  Respondent: 10765249 / Andy & Sonja Freebody  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12604  Respondent: 10769121 / Ali Elson  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13609  Respondent: 10773441 / Barry Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11559  Respondent: 10774145 / P Jordan  Agent:
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

- Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15331  Respondent:  10782689 / Murray Dudgeon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Comment ID: PSLPP16/9133  Respondent:  10785633 / Penelope Eagle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11132  Respondent: 10787073 / Clare Arnold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2 - Affordable homes - I object to this part of the plan as the houses proposed in the villages of The Horsleys will not be in the reach of many of the people who are entitled to purchase 'affordable homes'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15047  Respondent: 10796417 / Richard Shenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/848  Respondent: 10798049 / Steve & Maureen Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Support – flats for young Guildford people

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/234  Respondent: 10798977 / Ian Brooks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that:

“Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says:

“Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes. Moreover, in my time in Ripley, I have seen the results of the Borough Council’s laxness on affordable housing whereby a developer was allowed to increase the number of bedrooms in the houses he was building with the result that potentially affordable houses became too expensive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY H2 – Affordable homes

OBJECT. “Affordable” homes, under national definitions means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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We object to policy H2 Affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

We question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes would be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed might influence the market in more remote parts of the UK, but not here.

This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

In the draft Local Plan affordable homes is a misnomer, a designation that could have come straight from George Orwell’s Ministry of Truth. It refers to houses that are expected to go onto the market at 20% below the “market” price, or available at a rent of 80% of the prevailing “market” rate. Some of these are built to lower specifications than neighbouring houses, so that they remain profitable for builders. But when house prices and rents are high, so-called affordable homes are not affordable to those with low paid jobs or on benefits. “Affordable” homes are not the same as social housing, or old style council housing, and are not a replacement for any social housing that is sold off. Across the borough, according to the most recent data from the ONS, in Feb 2016, there were 5,696 housing benefit claimants. These “affordable” homes will be of no use to these people, or others on benefits, or on low wages. There is nothing in this policy for these people, many of whom need social housing, which has historically truly been affordable.

The Policy Statement (blue text in the Strategy and Sites document) refers to working “to increase the number of affordable homes in the borough and meeting identified needs.” But there is nothing in this plan that will meet the needs of those on benefits, or on low wages.

The Policy goes on to say that on sites “providing five or more homes, or sites of 0.17 ha regardless of the number of homes, at least 40% of the homes must be affordable homes....” A site of 0.17 ha is only 0.4 acre, and many single homes are built on plots of this size. This is a very low threshold. No exemptions are given – for example, what about
self-build housing, or shared ownership, etc? This policy does nothing to encourage various paths to property ownership, other than the affordable housing route – which for many people is simply not an option. It is poorly thought out and is based on data which is not accurate, including the West Surrey SHMA, which in any case should be revised because of the poor understanding of the borough’s population statistics that underpin the study and the Brexit vote.

In the wording of the text supporting this Policy there are many errors of fact, errors through omission and exaggerations in the introductory text to this policy. As an affordable homes policy should be a cornerstone of the Local Plan, some of these are reviewed in depth below.

**Paragraph 4.2.30**

The final sentence of this paragraph reads: “High demand and limited supply have resulted in one of the least affordable areas of the country to live in”. This is a profound statement, but one that was made without any supporting analysis, so it appears to be based on supposition, not on fact. Relevant analysis would consist of looking at demand for housing through, for example, population growth; then at the supply of new homes and the balance between these – and then compare this with property price increases. Then a similar analysis should examine other areas too, to assess if Guildford Borough is different from other local authorities within the south east. Obviously, this type of detailed analysis is not possible in a submission on the draft Local Plan, but the fact that this statement was made in paragraph 4.2.30 without any supporting information is a major concern, as this unsupported statement in itself could be considered to be the driver for housing policies within this draft Local Plan.

There is no question that property prices are high within the borough, but this is largely a consequence of being close to London, with a reasonably fast train connection. A Local Plan is supposed to focus on local needs, not the needs of those who wish to move out from London. All of Surrey and the home counties have high prices and recent statistics show that the rate of price increases in the East has been higher than in the South East. High prices are not a phenomenon unique to Guildford. This is shown in Figure 1, which shows that price increases in Guildford are mirrored in Woking and Dorking, which are in neighbouring boroughs. In fact, this shows that over the last two years price increases in Dorking have been higher than in Guildford. This figure was generated on the Zoopla website1.

**Figure 1. Comparison of Average House Price Increases**

It is also incorrect to suggest that high prices are a consequence of an imbalance between supply and demand – there are many factors that have an impact on property prices; the supply and demand balance is only one of these. Although it is not appropriate to have a detailed critique of why housing costs are high, as one of the declared goals of the Local Plan is to increase affordability it is appropriate to comment on other factors that affect house prices, and this has been done in Annex 1. This also provides a borough wide analysis of the supply of housing between 2001 and 2011 and the demand for new housing, using census data.

This shows that the population of the borough increased by 7,482 persons, of whom 3,723 were full time students aged 18 and over. A few of these may have been Guildford residents but the vast majority would be new to the area. Some students find accommodation in student halls, and as this accommodation expanded during this time period, it has been assumed about 40% of the increase in student population would find accommodation in student halls, leaving 2,234 that would need accommodation in the town. With 4 students per house, this need would be equivalent to 559 houses.

Census data for 2011 revealed that the average household in the borough was 2.42 persons, so the increase in demand for housing caused by the increase in population (excluding students), assuming 2.42 persons/household, was 1,553 new houses.

Thus the total number of new dwellings required by Guildford’s population increase between 2001 and 2011 was 2,112 (559 plus 1,553). In fact, the census reveals that the number of new dwellings was 2,692 – so supply actually exceeded demand by a considerable margin, about 28%. Yet over this period Land Registry data shows the average house price in Guildford borough almost doubled. As supply exceeded demand, other factors beyond the supply and demand balance affected house prices. This means that the underlying premise behind the Local Plan is incorrect; house prices
have not increased because of a supply/demand imbalance. At the very least this means that the 31 houses added to the housing target to promote affordability should not be included, but in fact the whole of the SHMA and Local Plan should be revised, to include a more accurate picture of the housing market, which is currently poor.

However, there has been no detailed analysis by GBC of housing needs, this was contracted out to a consultant, and the housing model used by that consultant has not been subject to any scrutiny. The SHMA did not examine fundamental reasons for house price increases, nor did it properly examine the historic supply and demand balance across the area. Consequently, the SHMA is not fit for purpose, as no understanding of the fundamental workings of the housing market was shown in this study. Had a proper analysis been carried out it would have shown that in 2015/6 across the borough there were 2,510 housing transactions, and analysed the price bands of sales. Of these, 713 housing transactions were below £300,000, which is approximately what a couple on average earnings in the borough could borrow. A more detailed breakdown is given in Annexe 1.

**Paragraph 4.2.31**

In paragraph 4.2.31, the text of the opening sentence reads “The West Surrey Strategic Market Assessment 2015 indicates that approximately half of the Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy.”

This sentence is plainly nonsense. The census data of 2011 showed that 66.6% of Guildford households either already owned or were in the process of buying their home. If the sentence refers to new households being formed in Guildford during the plan period, it should say so. If that were the case, it would not be surprising – the statistics on which the housing projections were based included a large increase in the number of full time students, a fact which was ultimately overlooked by GBC consultants, despite this being noted in several places in the SHMA. As shown in Annexe 1, census data shows 50% of the increase in population from 2001 to 2011 were students – and very few of these would be seeking to buy in Guildford, but are unlikely to take up a place at the university unless they had adequate funding, including the means to pay their rent.

**Paragraph 4.2.32**

Paragraph 4.2.32 discusses affordability in more depth and provides the ratio used by GBC to assess affordability. There are many definitions of affordability in use by different organisations and frequently this is a ratio between pay and house prices. GBC have decided to use a ratio which is of very limited value – the ratio of the lowest 25% of earnings to the lowest 25% of house prices. The higher this ratio, the less affordable the housing. This is a remarkable ratio as at the peak of home ownership in the UK, home ownership was just over 70% of total households. This is not because the remaining 30% did not want to own a house, although some did, but because in many cases home ownership was not a suitable option. This would apply to students, to migrant workers who wish only to work in the UK for a short time; people who do not want the responsibilities that comes with home ownership; people with temporary employment contracts, armed forces personnel, etc, etc. But GBC have chosen to consider affordability using the lowest paid – a group that have never been able to afford home ownership, or who may have no desire for home ownership. It is a bizarre ratio to use and is completely inappropriate to assess affordability in the borough.

It is more normal to consider the ratio between average pay and average property prices, though this is not an especially good ratio either, as average pay gives a certain weight to the lowest paid, who have never been able to afford home ownership. Average house prices are not a good measure either, as the sales of a few high cost properties will tend to push up average prices and distort the affordability ratio. It is much better to use the median property price in an affordability ratio. Another more relevant ratio is to use the average pay of first time buyers and the median price of properties purchased.

The text in the paragraph goes on to use government figures) from 2013, quoting GBCs affordability ratio (bottom 25% of wages to bottom 25% of house prices) of 10.92 which was said to be “higher than Surrey’s ratio of 10.89”.

The difference between these two ratios was 0.03, or in percentage terms, 0.28%. In others words, given that affordability ratios are estimates, there is no significant difference between these numbers. So it was nonsense to infer that property in the borough was less affordable in 2013 than in the rest of Surrey.
The text also states that the most recent data for this affordability ratio is from 2013, but in fact up to date information is provided by way of an interactive map which shows that Guildford Borough has a better affordability ratio than all but one of its neighbouring boroughs. In other words, housing is more affordable in Guildford than in most neighbouring boroughs. Data provided by the ONS was from Q3 2014 to Q3 2015, as full details for 2015 were not available. This map (and a supporting spreadsheet) provides 2 ratios, for median earnings to median house prices and GBC’s preferred measure, lower quartile earnings to lower quartile house prices. These are given in Table 1, and on GBC’s preferred lower quartile measure, Guildford is the most affordable of 6 of the 7 authorities listed, with only Rushmoor more affordable. On the more appropriate ratio of median pay to median property prices Guildford and Surrey Heath were essentially the same, with only Rushmoor again more affordable.

Table 1 Affordability Ratio Comparisons

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Lower Quartile Ratio</th>
<th>Median Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elmbridge</td>
<td>14.19</td>
<td>15.17</td>
</tr>
<tr>
<td>Woking</td>
<td>13.95</td>
<td>13.31</td>
</tr>
<tr>
<td>Waverly</td>
<td>13.7</td>
<td>14.67</td>
</tr>
<tr>
<td>Mole Valley</td>
<td>12.63</td>
<td>12.98</td>
</tr>
<tr>
<td>Surrey Heath</td>
<td>11.61</td>
<td>11.87</td>
</tr>
<tr>
<td><strong>Guildford Borough</strong></td>
<td><strong>10.89</strong></td>
<td><strong>11.94</strong></td>
</tr>
<tr>
<td>Rushmoor</td>
<td>8.95</td>
<td>7.85</td>
</tr>
</tbody>
</table>

This data shows clearly that GBC were incorrect to say that up to date affordability data was not available and more importantly, that of the local authorities that share a boundary with Guildford Borough, housing in Guildford Borough is actually more affordable than in almost all neighbouring local authorities.

Another indication of Guildford’s relative affordability was provided by an article in the Daily Telegraph. This was about a couple who had been resident in London, but had moved to Guildford so that they could save for a deposit, but who were considering a move back to London. A comparison was made of the costs of living in Guildford or London, including travel costs to work in London, which showed that annual costs in Guildford were lower by an estimated £3,052; about 16% cheaper living in Guildford than in London. This is why people are moving from London to Guildford – and is why if houses were built as per the Local Plan target, they would mostly be bought or rented by Londoners, not by residents of the borough.

**Paragraph 4.2.23**
This paragraph refers to sufficient housing to meet the needs of the borough’s population – but the proposed minimum of 693 dwellings a year is well in excess of the needs of the borough’s residents. The data used in the SHMA ignored the effect of full time students and so the housing number is very considerably in excess of the needs of the resident population. If this housing is delivered it will cause an increase in Guildford’s population that is considerably more than recent population growth – almost 5 times the rate of population growth during the period between the censuses of 2001 and 2011.

The final part of the paragraph is nonsense “…..ensuring people with a wide variety of occupations in the borough and potentially reducing travel to work journeys.”

Housing proposed in the Local Plan is mostly in the countryside, with about 70% of the housing proposed on land that is currently in the Green Belt. These locations are some considerable distance from employment centers, many of which are located in central Guildford – so journeys to work will increase, not reduce, and congestion will get much worse. This issue is considered in detail in Annexe 2, which shows clearly that building new homes in the countryside will result in many more traffic movements than building homes within Guildford.

Annexe 1

Housing Supply and Demand Balance Analysis in Guildford Borough: 2001 to 2011

As census data is considered by the Office for National Statistics (ONS) to be their “gold standard” this analysis uses only census data. Although data for subsequent years is available, this is based on many estimates and so analysis is more subjective.

Across the borough, during the 10 year period between the two most recent censuses4, the number of dwellings in the borough increased by 2,692, an average of 269 dwellings per year. During the same period, the population of the borough increased by 7,482 persons, but a high percentage of these were full time students, aged 18 and over. Some of these students may have been local, but as this was probably a small number, it was ignored. This data is summarised in Table 2, below.

Table 2 Census Data for Guildford Borough

<table>
<thead>
<tr>
<th>GBC</th>
<th>2001</th>
<th>2011</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings</td>
<td>53,388</td>
<td>56,080</td>
<td>2,692</td>
</tr>
<tr>
<td>Population</td>
<td>129,701</td>
<td>137,183</td>
<td>7,482</td>
</tr>
<tr>
<td>Students (18+)</td>
<td>7,004</td>
<td>10,727</td>
<td>3,723</td>
</tr>
<tr>
<td>Persons/household</td>
<td>2.32</td>
<td>2.42</td>
<td>0.10</td>
</tr>
</tbody>
</table>

Some of the increase in students would have found accommodation in students halls of residence (for example, the development in Manor Park opened in 2005) it is assumed that about 40% of the increase in student numbers were in student halls of residence, leaving 2,234 to find accommodation elsewhere. The majority of these would have found rooms in privately rented houses, categorised as “Homes of Multiple Occupation”. Assuming 4 students per house, the increase in student numbers would have needed 559 extra houses. The remainder of the population increase, the “permanent” resident population of Guildford, increased by 3,759 people. As the average number of people per
household was 2.42 in 2011, a further 1,553 dwellings were needed for this increase in population. So to house the overall increase in population, including students, about 2,112 additional houses were needed – but 2,692 were built. Thus the number of houses needed in Guildford to house the population increase was actually substantially lower than the supply available; so the balance between supply and demand was not responsible for the increase in house prices over this period, when average property transaction prices across the borough almost doubled.

During the financial years 2001 to 2011, average property transaction prices across the borough are shown in Table 2. This includes average and median property prices for transactions in the years shown. In any given year there may be several high priced transactions which distort an average, and so the median price is also given – the median is the mid-range price, so that 50% of transactions were below this price with 50% above. It is a better indicator of the movement of prices than averages. Also shown is the number of transactions for each year.

### Table 3 Land Registry Property Prices in Guildford Borough

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Price £</th>
<th>Median Price £</th>
<th>Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001/2</td>
<td>218,637</td>
<td>172,000</td>
<td>3118</td>
</tr>
<tr>
<td>2002/3</td>
<td>254,406</td>
<td>199,995</td>
<td>3211</td>
</tr>
<tr>
<td>2003/4</td>
<td>275,070</td>
<td>220,000</td>
<td>3036</td>
</tr>
<tr>
<td>2004/5</td>
<td>294,235</td>
<td>240,000</td>
<td>2851</td>
</tr>
<tr>
<td>2005/6</td>
<td>303,612</td>
<td>246,250</td>
<td>2974</td>
</tr>
<tr>
<td>2006/7</td>
<td>336,925</td>
<td>250,000</td>
<td>3294</td>
</tr>
<tr>
<td>2007/8</td>
<td>381,221</td>
<td>289,950</td>
<td>2867</td>
</tr>
<tr>
<td>2008/9</td>
<td>354,322</td>
<td>250,000</td>
<td>1481</td>
</tr>
<tr>
<td>2009/10</td>
<td>354,198</td>
<td>270,000</td>
<td>2127</td>
</tr>
<tr>
<td>2010/11</td>
<td>414,167</td>
<td>303,000</td>
<td>1916</td>
</tr>
<tr>
<td>2015/16</td>
<td>486,158</td>
<td>391,750</td>
<td>2510</td>
</tr>
</tbody>
</table>
The data in Table 2 shows that prices increased very rapidly from 2001/2 to 2007/8, and that the number of transactions was quite constant, at about 3,050±200. This represented a turnover of about 5.6% of all of the dwellings in the borough (53,388 in the 2001 census). Then in 2008/9, prices fell, and stayed low for two years. If the balance between supply and demand were the only factor influencing house prices this would suggest a huge increase in supply – but this did not occur. It can be seen from this that the balance between supply and demand must have had a minor impact on house prices. In fact, determining factors were the availability and cost of credit, and the demand for housing outside London. Credit was freely available and credit costs (in real terms) were low, consequently house prices increased rapidly from 2001/2 to 2007/8.

Data from Table 2 is shown in graphical form in Figure 1, and the impact of the recession of 2008/9 is clear. It interrupted the increase in property prices – but the reduction in interest rates that accompanied this recession, which provided very low credit costs, resulted in property prices increasing again in 2010/11. Credit costs continue to be very low and when combined with the huge expansion in credit from quantitative easing, the price of assets increased sharply. Again, this had little, if anything to do with the supply and demand balance for housing.

This picture of supply of housing exceeding demand across the borough is similar to the national picture. According to an article in the Guardian newspaper, across the nation between the years of 1997 and 2007, “the housing stock grew by 10%, but the population only grew by 5%. If house prices were a function of supply and demand, they should have fallen slightly over this period. They didn’t. They rose by more than 300%.”

So the issue of high prices is a national issue, not confined to Guildford Borough, and is not solely because of the supply and demand balance. Building more houses to increase affordability within the borough will not have the desired effect. This conclusion (based on data) is at variance with the Local Plan, and shows clearly that the evidence base underpinning the Local Plan is suspect, and that the analysis in much of this data base, especially the West Surrey SHMA, is inadequate.

The cursory analysis above also indicates the severe impact of having an additional 693 dwellings coming onto the housing market. At the beginning of the recession, in 2008/9, there were only 1,481 property transactions across the borough. Adding 693 dwellings to this would create many problems for any existing householders who wished to sell. As new build housing would be attractive to anyone moving from London, and is more expensive than equivalent “used” housing, the average price for housing would probably not fall – but householders would be forced to reduce their selling price in order to sell.

Given that the number of domestic property transactions in 2015/16 was 2,510, adding 693 houses to this mix would mean that redevelopment projects would not proceed. Existing run down areas of Guildford would become more run down – there would be no incentive to revitalise them under this proposed plan. Green field sites outside Guildford would provide the bulk of new dwellings – so large areas of Guildford would simply be left to decay. This is contrary to policies within the NPPF, specifically those policies that protect the Green Belt.

Figure 2 also shows that the median price is increasing more slowly than the average price, a clear illustration that the average price is not a good indicator of the housing market, due to the impact of a limited number of high value transactions.

**Figure 2 Property Transaction Prices in Guildford Borough**

A true picture of the housing market has not been presented in this Local Plan. A more accurate picture (for 2015/16) is given in Table 3, which shows, for example, that there were 183 housing transactions at a price equal to or lower than £200,000 during 2015/16.

**Table 4 Housing Transactions in Guildford Borough, 2015/162**

<table>
<thead>
<tr>
<th>Number of Transactions</th>
<th>Average of these</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
According to other ONS statistics, average earnings for Guildford residents in 2015 was £33,557 per year. A couple, with both on average earnings, using a multiple of 4.5 times earnings, could take out a mortgage for just over £300,000. According to the 2015/16 Land Registry data they would have had a choice during 2015/16 of at least 713 properties. This suggests that the affordability issue in Guildford has been exaggerated in order to promote a pro-development agenda.

Factors that Affect House Prices and Affordability

Across the UK, much of the planned increase in house building is related to the issues of high house prices and affordability – building more houses to increase the supply has been the approach adopted by the government, even though this policy is high risk, for example, consider the collapse of the housing markets in Spain, Ireland, etc in 2008/9 as a consequence of their massive house building programmes. There has been no risk analysis associated with the policy, either nationally or locally in the borough. House building appears to have been put in place as a strategy to drive economic growth, so that a great deal of effort (and government subsidy) has been devoted to this policy, to the detriment of other important policies, such as regional and industrial.

Affordability is not just a question of increasing housing supply, it is much more complex and a proper analysis should examine associated questions such as: why have real wages in the UK increased so slowly? Slow growth in wages means that house prices have outstripped the growth in real wages, and so affordability ratios have fallen. A sound, sustainable economy will not be built by housebuilding alone and to pursue this path is to embark on a policy that could well end in ignominious failure, with a housing bust similar in scale to that experienced in Spain and Ireland. But what other factors are important in determining house prices and affordability?

When considering this issue of affordability, and the approach of building more dwellings, there is an implicit assumption that the only determinant of house prices is the balance between supply and demand. But this is a nonsensical assumption. In 2008, when house prices in many regions of the UK (and across the world) started to crash, this was not because of a sudden massive increase in supply. Many other factors were clearly at work. Other factors that are important in determining house prices include:

The cost of credit – the interest rate: effectively this is set by government policy via the Treasury and then by the Bank of England. This has been extremely low for 5 years, and is set to remain low for the foreseeable future. Even before the reduction in the Bank of England rate to 0.5%, the real cost of credit had been low for many years – largely because the governments preferred measure of inflation, the CPI, does not include a measure of housing costs. The current very low cost of credit means that mortgage payments as a percentage of take home pay are lower for first time buyers than during previous property booms of 2005-7 and 1989-90. House prices are set by what people can afford to pay, and so property prices have climbed.

The availability of credit. At the very least this is regulated by government, but in practice it is effectively set by government policy, for example, quantitative easing has resulted in huge credit expansion leading to asset price inflation, including house price inflation. Current high house prices are a direct consequence of the economic policies of successive governments, spanning a period of at least 20 years.
Various schemes to assist buyers such as “Help to Buy” have enabled house builders to increase or maintain prices, so that much of the subsidies government pays ends up as builders profits. This is because, for example, equity loans are available only on new build properties.

Housing subsidies paid by the government. In 2015, about £24 billion was paid out as housing benefit, of which about £8.8 billion was paid to private landlords. Consequently, housing benefit has largely driven the buy to let boom. With a secure rental income, buy to let landlords can bid up the price of houses, beyond the reach of other buyers.

The growth of “buy to leave”, which is driven largely by money from overseas, some of which comes from the black economy and illegal activities in overseas countries. Overseas buyers effectively use a house in the UK (predominantly London and its environs) as a safe deposit box in the sky. This has led to a significant number of properties in London being sold to overseas buyers, who have no intention of living there – but their investment is safe and likely to appreciate in value. In the years 2015 and 2015, Asian buyers alone paid $24 billion for UK property, of which $20 billion was in London. This forces London residents to move out to the suburbs and beyond, pushing up prices across the whole of the south east. Brexit and associated financial instability is likely to have an impact on this, and it may create a downturn in the London housing market.

Taxes – not just stamp duty but other taxes contribute to the high final cost of a house. Taxes and levies on the excavation of raw materials from quarrying coupled with high landfill taxes increase the final cost of every house built, so that stamp duty is just another layer of tax – the icing on the taxation cake for government. What extraction taxes and energy policies have done is force the closure of British brick plants, cement makers, etc, etc. Now that there is a construction boom, building materials are being imported from all over Europe – bricks from Germany and further afield, roof tiles from Belgium, cement from France, etc. This leads to large increases in prices when there is an increase in construction – over the 5 years to 2016 brick prices increased by 25%, cement by 17%. The living wage will increase the pay of unskilled workers, such as labourers. Even in the recent past, a construction boom was a major stimulus for the British economy, but this is no longer the case because so much building material (and workers) are now imported. In 2015, the value of total imports of building materials from EU countries was £4.9 billion.

In addition, the Landfill Tax ensures that land is not used efficiently – it is cheaper to build large surface area car parks than to excavate and build car parks underground so that even when multi-storey car parks are built, they generally have no basement – because of the high cost of excavation due to high landfill taxes.

Guildford town is a classic example of inefficient land use, with large surface car parks at the university; park and ride car parks, at the railway station, and at employers throughout the town. This is a grossly inefficient use of land, but this inefficient land use is a consequence of government policy.

Profit margins of developers, which are currently somewhere between 20 to 30% on the cost of a house, even after high, exorbitant salaries are extracted from the companies for company executives.

As an example, Berkeley Homes has in place the most generous bonus system ever put in place by a British company, with £1 billion due to be distributed to company executives if certain targets are met – and the company is en route to meet these targets, mainly because of its ability to set and maintain high house prices. The chairman of Berkeley Homes was one of the highest paid persons in the UK in 2015, with his benefits amounting to more than £22 million for the year.

Profit margins enjoyed by housebuilders would not be tolerated in government regulated industries such as utility companies, or in food retailers, etc. It applies to the most expensive purchase the vast majority of purchasers will ever make, and it shows clearly that the housing market model used by the government (supply by the private sector only) is working only to benefit developers. It is functioning as a free market – but it is not a true free market because of the other factors that determine house prices such as government subsidies, including housing benefit. These create a win:win housing market for developers. The ability of developers to control housing supply is a major problem with the housing market – it is not the planning system that limits the supply of new dwellings, it is developers ensuring that they can maximise their profit margins by drip feeding new builds onto the market. The Local Government Association stated that there are potentially 400,000 dwellings with planning permission but construction had not been started. So the problem is in the operation of the market, not in the planning process. Reforms to the way that the housing market
operates are long overdue, for example, through a large social housing programme, managed by a national housing executive.

Government regional policies also have an impact on house prices. This is evident in the way that property prices have or have not recovered after the property price crash in 2008. Not all regions currently have higher house prices than their 2007 peak values: This is clear evidence of an ineffective regional policy, and shows the publicity around creating a “northern powerhouse” is hyperbole. One strand of an effective regional policy would ensure that a genuine free market was allowed to run its course, so that as building in London and the south east became more difficult and expensive (due to strong planning policies protecting the Green Belt and countryside) development would be pushed to other regions, ensuring these regions grew. Instead, the government seek to make it easier for developers to build in areas with the highest growth, by weakening planning policies, so that development is concentrated in London and the south east, especially in the countryside. The effect of this policy (in reality the lack of an effective regional policy) means that demand for development of all types continues to grow in and around London, so that house prices can be increased and controlled by developers. This increases the wealth gap between the London plus the south east and other regions, and limits employment growth in these areas.

Immigration has a major role in the supply and demand equation – if the rate of immigration were not so high, the demand for housing would be substantially lower. Migration Watch have estimated that at least 40% of the housing demand is due to immigration, but their estimate was based on a lower number of migrants than the current level of immigration, and does not include the impact of the children of migrants, nor does it include the demand from illegal immigration. Thus the government’s immigration policies have had a major impact on the demand for housing. Immigration also has an impact on pay – it helps keep pay levels low, so that employers are not forced to pay more to help with recruitment. This has an impact on affordability ratios. Although there is a construction boom, with a supposed shortage of skilled workers, pay within the construction industry has not increased as rapidly as it has done in the past. This is because employers can recruit immigrants, who will work for lower rates of pay, for example, 50% of sub-contractors working for Berkeley Homes are from eastern Europe. So not only does this policy have an impact on the supply part of the housing equation, but it also has an impact on the ability to afford housing by keeping pay rates lower than they would otherwise have been. A recent estimate by employers was that pay rates for skilled workers in construction have increased by 6%. Historically, this is a very low increase for pay rates in the middle of a construction boom. If immigration policies change as a consequence of the Brexit vote, the pressure placed on housing supply by immigrants will fall, and this should be reflected in revised housing policies.

Annexe 2

Contribution to Traffic Movements and Air Pollution

The Local Plan proposes building a minimum of 693 houses per year, of which 2,400 (17%) will be built within Guildford. The remainder (83%) will be built in the countryside. This is very much against advice from the Institute for Air Quality Management. Intuitively, it seems likely that this spatial distribution of housing would increase car and van journeys with a consequential increase in air pollution that is related primarily to vehicle emissions. This paper examines statistical evidence to assess the impact on vehicle journeys within the borough.

Spatial Vision

The spatial “vision” proposed in the Local Plan is the reverse of that recommended by the Institute for Air Quality Management, who said8

“The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase road traffic.

This report also suggested that
“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done within the borough. This is despite requests to the council to set up an AQMA following air quality tests that show high pollution levels in at least one village which has high traffic levels.

**Sustainability**

To examine the claim that the draft Local Plan contributes to sustainability several areas could be analysed. One of these is the impact on traffic, to assess the impact of adding additional housing in the countryside rather than in Guildford centre. This can be gauged by comparing the likely impact on car ownership of building housing in a rural location as opposed to an urban area of Guildford. Effingham has been chosen for this, but it could be any of the rural villages in the borough, and the impact of additional housing in this village is compared with additional housing in an urban area, Walnut Tree Close/Station area. This can be done using census details, taken from the Office for National Statistics (ONS) publications, so that availability of cars and vans can be compared as well as methods of travelling to work.

**What have traffic levels to do with sustainability?**

Traffic is a major contributor to air pollution, and air pollution has a significant effect on health. In April 2014, Public Health England produced a report that reconfirmed the estimate by the Committee on the Medical Effects of Air Pollutants that approximately 29,000 deaths per year in the UK could be caused by pollution from man-made particulate matter. This report estimated that there were 55 deaths per year in the borough attributable to air pollution. Particulates are very small air borne particles and transport is the single largest contributor to particulate pollution.

But air pollution is not limited to air borne particles - it includes many other pollutants, and one group that affects human health, especially that of children, is the gaseous oxides of nitrogen, nitrogen dioxide (NO2) and nitrogen monoxide (NO). When taken together these are usually called NOx. Nationally, almost half of these gases are produced by transport. In a submission to the House of Commons Report “Action on Air Quality” published in November 2014, Dr Ian Mudway of King’s College, London said:

“We have also found effects on infant mortality rates, on pre-term birth and on cognitive performance in children. There is some interesting data emerging on traffic proximity, diesel emissions and traffic potentially autism spectrum disorders… The evidence over the last three or four years that children growing up near traffic in areas with high NO2 and primary particle emissions have stunted and impaired lung development is incredibly strong.”

As well as health aspects, road safety is also important – increased traffic levels means more congestion, more delays, more stress, and inevitably, more accidents.

Areas in London exceed the EU limits for various air borne pollutants, in particular, NOx. This has been on a scale that will result in the imposition of substantial fines on the UK government – and the UK government has expressed a desire for this to be passed to local government in areas that are out of compliance. Although Guildford Borough has a very limited air pollution monitoring regime they have one station that regularly exceeds limits – that at Wisley. Even though this is very poorly sited (meaning that the actual NOx concentration in this area is considerably higher than that being recorded) it has consistently been above EU limits. Thus the borough’s taxpayers may have to share in the costs of the EU fine.

Since traffic has a major impact on air pollution, and as air pollution has a significant on health, especially that of children, it is an important element in sustainability – so the impact on traffic levels of housing policies should be assessed, in detail, before making claims that housing policies are “sustainable”.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17522  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Detailed Traffic Comparisons

Levels of car ownership vary substantially, as can be seen from the figure, taken from the data in Table 1. This data is taken from 2011 ONS Census data, as published in the series “Neighbourhood Statistics”.

The average number of cars or vans per household is highest in Effingham, with an average of 1.9 cars or vans per household in Effingham in 2011, compared to an average of 0.93 cars or vans per household in Woodbridge Meadows/ Walnut the Station. This suggests that plans for high levels of development in the countryside go against all the ideals of achieving sustainable developments as car and van availability is an indicator of how often those vehicles will be used.

Table 1  Comparison of availability of cars or vans

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2001</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Effingham (Parish)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>1.89</td>
<td>1.75</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>4.7</td>
<td>7.3</td>
</tr>
<tr>
<td><strong>Woodbridge Meadows, Walnut Tree Close and the Station</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>0.93</td>
<td>1.01</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>34.2</td>
<td>30.0</td>
</tr>
</tbody>
</table>

In Effingham, there are very few households that do not have a car or van available, at 4.7% of total households, compared to 34.2% in Woodbridge Meadows, Walnut Tree Close and the Station. Given the limited range of shops and services available in rural villages this should not be surprising. Most residents have to drive to be able to access basic health services, and for all but the most basic of shopping needs, employment opportunities, etc. This shows very clearly that it is very likely that there would be increased traffic on the roads throughout the borough as a consequence of additional housing in the countryside, and that this increase in traffic would be lower if additional housing were built in the centre of Guildford.
Experienced city planners such as Lord Rogers have called for increased density in towns and cities as a way to provide extra housing, provided increased density is accompanied by improved amenities and sensible traffic management plans. This is because of the benefits of increased density – towns and cities work better, with better public transport, better access to services, and a reduction in car journeys. Woodbridge Meadows, Walnut Tree Close and the Station are ideal locations for increased population density – the railway station is within walking distance, as is much of the town centre. This is recognised to a limited extent by the Masterplan prepared for Guildford Borough Council, but does not seem to have been recognised in the 2016 draft Local Plan.

As the 2011 census had details of the methods used to travel to work, it is possible to test if traffic implications are in line with these expectations.

Methods of travel to work illustrate differing patterns of car and van use, with the details given in Table 2. In Effingham, only 14% of employed people who travel to work use public transport and almost 75% travel to work by car or van. Only 8% of those who travel to work walk or use a bicycle in Effingham, whereas in the Woodbridge Meadows/Station area the comparable figure is almost 33%.

Differences are illustrated in the figure showing the proportion of people who travel to work using public transport, walk or by bike. Building more houses in the countryside will result in many more car journeys – just to get to work. Many more would also be necessary, for residents to shop, to access financial and health services, etc. This shows clearly that car journeys would be minimised if new housing was concentrated in urban areas of Guildford.

Sensible planning should seek to improve the ability to use these modes of transport and the impact on the number of car or van journeys is very clear from the comparisons made here.

This type of analysis should be a feature when choosing to claim an option is “sustainable”, but it has not been a feature of the draft Local Plan. Claims made that building housing in rural areas is a sustainable option do not stand up to simple scrutiny, even without the consideration that it is proposed to build housing on the limited resource that is farmland.

Table 2 Comparison of Methods Used to Travel to Work in 2011

<table>
<thead>
<tr>
<th>Travel to Work, 2011</th>
<th>Effingham</th>
<th>Woodbridge Meadows, etc</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of those in employment working from home</td>
<td>10.5</td>
<td>5.2</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by car or van</td>
<td>66.9</td>
<td>34.4</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, by car or van</td>
<td>74.7</td>
<td>36.3</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work on foot or by bike</td>
<td>7.1</td>
<td>30.9</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, on foot or by bike</td>
<td>8.0</td>
<td>32.6</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by public transport</td>
<td>13.9</td>
<td>27.4</td>
</tr>
</tbody>
</table>
Percentage of those in employment and who travel to work, by public transport

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<table>
<thead>
<tr>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>15.5</td>
<td>28.9</td>
</tr>
</tbody>
</table>

Conclusions

The spatial planning in this draft plan will increase traffic movements and consequently, air pollution. Air quality should be a constraint used to limit the housing target. Even with a lower housing target, instead of what is proposed a higher proportion of housing developments should be within Guildford town. This could be achieved by recognizing that an expansion in retail and warehousing and distribution within the urban area is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality, with proposals to reduce noxious emissions, for example, through the use of LPG fueled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 24,000 cars and vans to those already in use within the borough, based on car ownership levels in a rural village and an urban area in Guildford. This is the approximate number of vehicles that the proposed housing additions would bring, thought his number would vary, dependent on where the additional houses are located. If all the proposed housing were within Guildford, then instead of 24,000 about 13,000 cars and vans would be added to the existing total. In the census of 2011, the total across the borough was just under 54,000 cars and vans.

The comparisons made above show that traffic and air quality has not been considered in the spatial allocation of housing. Sustainability claims have not been analysed in drawing up the housing proposals featured in the draft Local Plan. A simple comparison of only one aspect of sustainability, car use (with its associated air pollution), shows very clearly that building extra housing in Effingham (a typical rural area village) is the least sustainable option. As a method of travel to work, car use in Effingham was shown to be much higher than in an urban area of Guildford, so to limit increases in traffic and emissions from traffic, housing should be provided in areas closer to employment opportunities and with access to good public transport. This does not mean that no additional housing should be provided in the countryside, but this housing should be limited in quantity, in keeping with its Green Belt status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/816  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. “Affordable” homes, under national definitions means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/602  Respondent: 10804993 / Alex Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
• I object to the lack of a balanced and sustainable strategy combining development and conservation and providing affordable housing for local people

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/11056</th>
<th>Respondent: 10809377 / Bernice Williams</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

13. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an 'affordable home' is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will 'affordable homes' be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12245</th>
<th>Respondent: 10816993 / Jane Roberts</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of £360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/470  Respondent: 10818529 / John Hales   
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13505  Respondent: 10824193 / Rupert Phillips   
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The University have stated on several occasions they require more accommodation for students as they intend to expand the numbers in next few years. This would increase demand for property to let reducing options for local residents and as no council tax is paid by students lowering income to the Borough which could be invested for the benefit of the majority of population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13508  Respondent: 10824193 / Rupert Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The expressed views of the University described recently in the Surrey Advertiser are in their interests and not the residents of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1458  Respondent: 10828737 / Claire Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version states: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

The developer isn’t required to provide any ‘affordable’ homes, only to make a negotiated payment to the Council. This is very unlikely to result in the construction of any ‘affordable’ homes’.

Furthermore, the 2016 Plan stated (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. This statement has now been removed thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1356  Respondent: 10828897 / Christopher Merrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”. The 2017 version states: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

The developer isn’t required to provide any ‘affordable’ homes, only to make a negotiated payment to the Council. This is very unlikely to result in the construction of any ‘affordable’ homes’. Furthermore, the 2016 Plan stated (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. This statement has now been removed thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6627  Respondent: 10829121 / Julie Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY H2 – Affordable homes

- Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4826  Respondent: 10836097 / B.V. Dabbs  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO NO CASE FOR DISABILITY CARE OR AFFORDABLE HOMES

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to POLICY H2 – Affordable homes

- Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable! Pushing for these houses just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1.3 In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

1.4 I question the assumptions that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply sucking more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

1.5 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market. In addition the many additional homes will in themselves create an additional need for further affordable housing, creating an unsustainable feedback loop at the heart of the policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1104  Respondent: 10846625 / Frank Drennan  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The proposed changes to the plan will not satisfy the goal of the policy i.e. to deliver a wide variety of high quality homes that provide all tenures, types and sizes of housing to meet the needs and demands of different people in our community.

With reference to section 5.22 of the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017, the statement that "it is reasonable to consider that 40% of housing could be delivered as affordable for the purposes of following the advice set out in the PPG as above" is a clear example of wishful thinking on the part of those writing the report and is not supported by any evidence. On the contrary, experience shows that 40% is a wildly optimistic assumption and it is reasonable to expect that the council will struggle to get developers to agree to anything in excess of 20% at best.

It is also noted that section 5.20 of the above referenced report highlights that "The updated assessment indicates that 517 households per annum require support in meeting their housing need. This is higher than assessed in the 2015 SHMA, reflecting higher new household formation shown in the updated demographic analysis together with evidence that lower quartile rental growth has exceeded growth in incomes, meaning a higher proportion of households fall into affordable housing need". GBC offers no credible solution to this problem and instead will only exacerbate the issue by building a large number of homes catering to the relatively wealthy, and thereby creating further need for affordable housing to meet the needs of the greater number of lower income people attracted by the inevitable greater level of economic activity.

GBC's approach is therefore not sustainable and will do nothing to meet the aspiration of its own policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 I object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.

1.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

1.3 In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

1.4 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

1.5 GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7182  Respondent: 10854113 / Sarah Pickering  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1111  **Respondent:** 10857217 / Mark Sherwood  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

House prices and affordability. It is expensive to live in the Horsleys. Would the new homes have government subsidies to make them affordable for people? Other wards in the county have land to build on, green belt or not, and are in designated areas of deprivation. Ash and Tongham are such wards identified by the Council as priority areas to invest and improve. What of house prices? Would so many extra houses stagnate house prices in the villages? Another major reason for being here is that is so desirable, build on the green belt and you reduce that desirability.

I strongly urge you to reconsider, debate and propose a new strategy. One that does not take away our green belt and one that is focused on the wards you have identified as priorities where there is infrastructure to support new housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/14651  **Respondent:** 10857249 / Alice Pashley  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/8868  
**Respondent:** 10857889 / William Kyte OBE  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Policy H2: Affordable homes**

**I OBJECT** to this policy

Affordable homes, under national definitions, means homes which are sold or rented at 80% of market value. This means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable.

There is a need for more social housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: pslp171/1719  
**Respondent:** 10857889 / William Kyte OBE  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The policy has been weakened by deleting the requirement for 40% affordable homes on some developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/18589  
**Respondent:** 10858977 / Angela Otterson  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I object** to policy H2 Affordable homes.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.
In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1945  Respondent: 10859489 / Jennifer Procter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2 AFFORDABLE HOMES

1.1 I object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.

1.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

1.3 In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

1.4 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

1.5 GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity. North Downs Housing Ltd set up last February by the council and run by councillors to “tackle the shortage of homes in Guildford and in particular, the shortage of affordable homes and a mixture of other tenures that are ‘affordable to everyone’ “ seems to be missing the point when the stated aim is to let to people with incomes above £30,000 a year. Affordable homes are desperately needed for all those workers who earn less than £30,000 a year and this again begs the question regarding the ambition and direction of GBC when it comes to planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY H2 AFFORDABLE HOMES

I object to policy H2 Affordable homes.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Even if the huge number of houses to be built can be justified, the local community will not benefit. There is no clear requirement for affordable housing - GBC apply an 80% of market value rule to define affordable, which is obviously laughable, while the Local Plan seems to suggest that any developer can simply choose not to build affordable housing. This means houses are built for investment by wealthy individuals and businesses, failing to deliver any community benefits.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/10916  **Respondent:** 10866721 / Andy Court  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Insufficient affordable housing

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/11694  **Respondent:** 10868609 / Robert Lockie  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to much ‘talk’ of affordable house in the proposal/meetings but what is affordable housing, affordable by whom. The area is notorious for high house prices which would probably only be affordable for people moving out of London as it is too expensive for them. The people in these ‘affordable’ house would then travel into London for work thus adding nothing to the actual housing needs of the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/6927  **Respondent:** 10872961 / Liz Cass  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is demand for more social housing in that area.
As a result of this defective affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

I object to Policy H2 on the basis that it fails the test of sustainability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13661  Respondent: 10874273 / Margaret Pearce  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H2 (affordable homes). Affordable homes are I understand to be about 80 percent of the price of normal prices for the area. Due the high cost in the area these so called 'affordable' homes are not affordable for young people like teachers, policemen, or firemen or nurses we have just had some affordable houses built in East Horsley at a cost of nearly £700,000.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14524  Respondent: 10876033 / Lucie Paulson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy h2

- "affordable" in the Surrey context is interesting choice of descriptor. Who are we building these affordable homes for exactly? From direct experience, these homes are far from affordable, they do not house workers who will jump on the occasional bus

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16423  Respondent: 10876033 / Lucie Paulson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy h2

- university needs to do more to house students on campus freeing up space in Guildford town
- "affordable" in the Surrey context is interesting choice of descriptor. Who are we building these affordable homes for exactly? From direct experience, these homes are far from affordable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3816  Respondent: 10878465 / George Kalorkoti  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. I OBJECT to the affordable housing policy because it assumes one size fits all and is applied uniformly across the borough. I am asking that it should be revised so that it is targeted where the need and demand exist.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18208  Respondent: 10883201 / Danny McHugh  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY H2

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In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviuable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that

“Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says:

"Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site."

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for
not delivering affordable houses]. That section has now been removed, thereby accepting that needing to make greater than normal profit \textcolor{red}{IS} to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18115  **Respondent:** 10910273 / Lynda M Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

We support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

EHPC accordingly OBJECTS to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/853  **Respondent:** 10910753 / Heather Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil
value”.
The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/7207</th>
<th>Respondent: 10915361 / Judy Young</th>
<th>Agent:</th>
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<tr>
<td>POLICY H2 – Affordable homes</td>
<td>I OBJECT to this policy as it will be unenforceable– therefore, greenbelt land would be lost without any achievable integrity in it’s aims.</td>
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<td><strong>Affordable homes</strong> OBJECT. While I accept the need for some new starter homes, surely the logical location for these would be in places with employment opportunities such as town centres. Otherwise, the new residents would need to commute to work with all the downsides in terms of the impact on the environment, more pollution, more road congestion, greater strain on rush hour train services etc.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Attached documents:</strong></td>
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<th>Comment ID: PSLPP16/11313</th>
<th>Respondent: 10923297 / Matthew Burnham</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

- Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1703  Respondent: 10933793 / Julia Tilbury  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2- Affordable homes

I OBJECT. "Affordable" homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people's means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government's policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy's version of "affordability" is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1675  Respondent: 10933857 / C J Tilbury  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15360  Respondent: 10935201 / Cathryn Walton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9329  Respondent: 10943457 / Henry Benzikie  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15821  Respondent: 10953249 / Charlotte Ladd  Agent: 
Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13546  Respondent: 10955009 / David Kratt  Agent: 
Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The developments proposed are quite simply out of all proportion and will neither solve the need for social housing nor affordable homes for young families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

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<td>Policy H2. – I object</td>
<td>Affordable housing should comprise about 80-90% of any new developments.</td>
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<td>POLICY H2 – Affordable homes</td>
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<td>I object to this policy as it will lead to the loss of countryside for no local benefit.</td>
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<tr>
<td>The definition “Affordable” homes, is totally misleading. 80% of Market Value in any of Guildford’s rural districts such as Clandon and the Horsleys is not in any way affordable. These will just be discounted houses for millionaires. The council should be looking to build low cost, social housing that people can afford. This is nothing to do with “Affordable Housing” as defined.</td>
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<td>None of the homes proposed under this plan are likely to be homes which are sold or rented at 80% of market value. Even at 70% rented, these are going to be expensive for most people except footballers and hedge find managers. We need starter homes for local people.</td>
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WE KNOW NOW that if the developer doesn’t even have to provide any ‘affordable’ homes, simply to make a negotiated payment to the Council, this is highly unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12984  Respondent: 10972065 / Sarah Cocke  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H2

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Attached documents:

Comment ID: PSLPP16/9193  Respondent: 10985057 / Anthony Parker  Agent: 

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Affordable homes – I OBJECT. “Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/9021  **Respondent:** 10987905 / Marika Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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**Comment ID:** pslp171/2010  **Respondent:** 10989761 / James Walsh  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Policy H2, p.44, Section 1: While I welcome the Council’s commitment to work with partners to provide more affordable homes, I would support the development of mixed-tenure estates rather than estates of either private or “affordable” housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
<table>
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<tr>
<th>Comment ID: PSLPP16/8335</th>
<th>Respondent: 10990145 / Anne Lee</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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<th>Respondent: 10992833 / Amanda Verny White</th>
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Attached documents:

Comment ID: PSLPP16/12007  Respondent: 11000865 / Nicholas Clemens  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2: Affordable Homes

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17892  Respondent: 11001761 / Brandon Sievering  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a current Send/Ripley resident, I wish to inform you of my objections to the 2016 Draft Local Plan:

I would like to object to the proposed new Send and Ripley developments. I appreciate some additional housing, in particular "affordable" housing, will be required in future. However, I do not believe destroying Guildford's beautiful and protected Green Belt is the way to do this.

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Attached documents:

Comment ID: PSLPP16/2445  Respondent: 11014881 / Linda Peters-Smith  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2 - Affordable Homes

I object. Affordability is being used to push more development.

Under the national definition they are to be sold or rented at 80% of market value. Even at 70% these will remain beyond most people's means meaning they won't be available for local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3851  Respondent: 11032129 / Claire Sinclair  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The affordable homes policy is laudable but GBC are planning on building them in the area of least demand where transport links are not good and there are limited jobs. In fact the demand in the village is for affordable three bed homes, contrary to what BC have outlined. The plans fail the test of sustainability on many counts, including this one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17807  Respondent: 11033921 / Tim Depledge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Affordable Homes - I object - I see no reason to set arbitrary targets of 40% affordable homes (and what is the definition of affordable), and the fact that 70% must be rented for the parish of West Horsley specifically. Also, what is the basis of the calculation of the number of affordable homes based on a SHMA which is neither transparent or appropriate to current needs?
Furthermore, market forces given the prosperity of the local areas and proximity to London mean this policy is simply not relevant or applicable.

I must ask where are these people supposed to work? My understanding is that affordable homes are provided for those individuals in the local community whose jobs are critical to the local infrastructure, but may not earn sufficient money to be able to afford to live in the local community.

There can be no basis for over 200 Affordable Homes within the community in which we live, we are a small village within limited local services. This therefore assumes that people will be commuting to work in other communities. I reference in this letter the lack of public transport and the impact on the local road network in the area, hence, I am left somewhat at a loss to establish how such a large number of houses can be justified for the community of West Horsley, and East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Comment ID: pslp171/2170  Respondent: 11036129 / George Dokimakis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Policy H2 should change back to mandating social housing. Point 4 of it should be removed.
- 4.2.40 should be re-instated. Community benefits are not an excuse to avoid affordable housing.
- The validity argument is too weak and vague. It needs to be strengthened including a better definition of what is economically viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14108  Respondent: 11036289 / Osman Abdullah  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14580  Respondent: 11036801 / Judith Mercer  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Using the term "affordable" under the national definition, refers to homes that are sold or rented at about 80% of market value. Unfortunately, the market prices of homes in the southeast are so high that these homes are likely to remain way beyond the means of most people.

People do not have a right to live in a certain area, but they can have aspiration and wish to live in a particular place.

If more houses are built, even smaller ones they will not be affordable starter homes or homes for many families because they will be too expensive. They will be bought by people coming out of London and it is they that push up the price of the homes due to their demand for houses out in the Green Belt areas and a short commute from their jobs in London.

I object to a policy where the consequence will be that our green countryside will be ruined for the benefit of DEVELOPERS and COMMUTERS under the guise of homes for local people. This is a policy using the misnomer "Affordable" as a ruse for more development which will NOT benefit the local people. It will as a result destroy the Green Belt which gives space and fresh air to this borough, which ironically Londoners want to enjoy!!

The viability clause (4.2.40) means the policy in practice could be unenforceable. It should be removed from this policy as it only benefits the developers not the local area.

This policy will not influence the market prices in the Guildford Borough area because of the continual demand from London. Building more homes will not make them more affordable in the real sense of the word. The policy is wrong about its reasons for more so-called affordable homes and is using this as a pretext to promote more development generally, which in my opinion, we do not need.

Our Green Belt and green fields should not be given up in such a cavalier way. The Council has a responsibility to protect it all on our behalf and proper protections in all areas of this plan should be put in place to achieve that.

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Attached documents:
Policy H2 Affordable Homes

I object to the changes in Policy H2 which still do not go far enough to address affordable or social housing. Affordable homes if one looks at the Guildford property market, and it's not difficult to see, are going to be too expensive for the average local worker/family to afford. They will never be enough proper starter homes or social housing at low rent (like council housing), unless GBC make a conscious effort to try to include more provision for this in their development planning.

GBC should plan for use of existing GBC land holdings, which are extensive, to provide for LOCAL not-for-profit social housing schemes. This would give those such as nurses and teachers in the borough a chance to get a home they can actually afford. I object to the continued planned agenda of GBC through the use of the local plan, to allow for a preference for building executive homes for commuters and Londoners, instead of homes for low income groups e.g. children who have grown up in Guildford and want to rent or buy a shared ownership locally. I object again to the “viability clause” which means the policy is unenforceable. This is unacceptable and shows GBC to be “on the side of the developers”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5508  Respondent: 11043553 / Geraldine Banks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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Attached documents:

Comment ID: PSLPP16/4876  Respondent: 11047329 / Hazel Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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Comment ID: PSLPP16/12986  Respondent: 11047873 / Mary Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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Comment ID: PSLPP16/671  Respondent: 11048289 / Susanna Harrington  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

"Affordable housing" is a misnomer in any case. Any "affordable" housing in Surrey will only be affordable for the first sale and then the price will immediately shoot up to being unaffordable on the second and subsequent sales.

Affordable housing is needed mainly in town centres and in particular on Guildford brownfield sites and brownfield sites in other Surrey towns.

Affordable housing is needed for people like carers, nurses, firemen and community workers who are suited to living near hospitals and with bus and train services already established. Guildford does not need its brownfield sites for business and retail development. The very nature of shopping is changing as younger generations will do more and more on line. Guildford abounds with retail outlets as no doubt do other towns in Surrey. The Council must provide housing in towns where it is most needed and some sort of control over pricing must be thought through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7584  Respondent: 11049473 / Victor Bates  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**Comment ID:** pslp171/246  **Respondent:** 11051521 / J and M Baylis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )


4.2.40 I consider that “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost.” should be retained.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**


**Attached documents:**

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**Comment ID:** PSLPP16/13421  **Respondent:** 11051649 / Andy Lewis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

1. **Affordable Housing**

   GBC is seeking to provide a policy that provides affordable housing, and meets the criteria for 40% of new housing being affordable. But in almost every regard, the LDP fails to deliver this. What is really important is that young people in the GBC area are able to buy their own homes. GBC thinks it is acceptable that rented homes, student accommodation, and travellers pitches can be sufficient. Travellers pitches are needed, but by no means should they count towards
affordability measures. Student homes are for transient population, and we need to provide affordable homes for the next generation to settle in our midst – in the villages as well as Guildford town centre.

However, it appears that GBC are more than happy to let developers buy their way out of providing affordable homes for purchase in the rural villages (where they are needed), but committing to build more rented accommodation elsewhere in the Guildford area. GBC should mandate that developers stop building massive homes and provide proper sustainable development – but in keeping with the existing surrounding density, not at the density proposed in the infill locations.

A further issue arises in the LDP in that there is no attempt to address the issue that affordability ratio is over 10 compared to the national average of just under 6.5. This is a serious issue and warrants more extensive consideration and treatment, but is glossed over in the LDP.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/12842  Respondent: 11053825 / Claire Owen  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
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Comment ID: pslp171/993  Respondent: 11053825 / Claire Owen  Agent:  
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16792  Respondent: 11058913 / Tarn Stroud  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

The policy will not contribute to homes for local people, as even the ‘affordable homes’ will be too expensive for those local people finding difficulty in affording local properties. The policy should look to provide homes for local people, rather than providing a way for more people to move into the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslpp171/2547  Respondent: 11061185 / Peter Komisarczuk  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy 4.2.23, affordable housing. I note that you have clearly sided with the developers – that the developers can pay you off and avoid building affordable homes at all. How does this help young families in the borough? Are you going to use the pay off to build the affordable houses that the developers will not?

Clearly not as that is not in the proposed plan! Perhaps the pay off is not large enough, because it optimises the profit for the developers and does not allow you to commission equivalent affordable housing within the borough.

- Removal of section 4.2.40 from the proposed local plan shows that you are willing to provide developers with the opportunity to make more money from their developments.
- This is an unacceptable policy from local government – clearly we simply don’t count and you wish big business to prosper further. At least you are now being open in your desire to build big business profits at the expense of our environment and us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3758  Respondent: 11069601 / Barry Kiddell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
I Object to Policy H2.

There is no point in having a policy for Affordable Homes when their provision will always be at the whim of profit motivated developers and the state of the housing market. In any case the definition of “affordable” bears absolutely no relation to what can actually be paid by people, perhaps in essential jobs, who have to live in this over-priced borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY H2 (AFFORDABLE HOMES) – I object. There’s nothing “affordable” about the way these homes are defined. They just mean more development. It also makes it too easy for developers to claim they can’t be built because they’re not commercially “viable”.

If Guildford builds 13,000 new homes it will make zero difference to house prices, so why try to manipulate the market with this policy? Poorer people will have to continue to move to cheaper parts of the country. Is that necessarily a bad thing? Labour mobility is Government policy, not local autarky.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.
In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4685  Respondent: 11096897 / Rob Workman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing with regard to the proposed Guildford Borough Draft Local Plan with particular reference to the Horsleys. I strongly object to this part of the plan.

Although I have only permanently lived in West Horsley since the year 2000, my connections go back to the 1950s when my grandparents lived in the village and actually owned and ran the West Horsley newsagents in the 1940s. Over the last fifty to sixty years there have been changes, but not massive ones. The character of the Horsleys has remained roughly the same, although property prices have forced many local youngsters to move on and out of the area.

The local West Horsley Post Office and Newsagents was recently converted into a flat and is currently on the market for £385,000. How many first time buyers could manage this? Are the proposed houses going to be any less pricey? Furthermore, with the Post Office disappearing, local shops for the proposed build on the Bell and Colvill site (A37) are dwindling. There also seems to be an access problem with this site and we received through our door a note from a company, that seem to have acquired the site, called ‘Dandara’ encouraging us to give our support to a development on this site on the grounds that it is surrounded by existing development, on a strategic highway route, on low quality Green Belt land, visually self-contained and protects the use of higher quality Green Belt land elsewhere. Surely this sort of approach cannot be encouraged and if 40 homes are proposed for this site and Dandara build, of what type will they be? The product which “reflects and draws upon the architectural character of the local area” quoted in the Dandara flyer could mean anything.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15849  Respondent: 11150913 / Sarah Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

I am writing with regard to the proposed Guildford Borough Draft Local Plan with particular reference to the Horsleys. I strongly object to this part of the plan.

Although I have only permanently lived in West Horsley since the year 2000, my connections go back to the 1950s when my grandparents lived in the village and actually owned and ran the West Horsley newsagents in the 1940s. Over the last fifty to sixty years there have been changes, but not massive ones. The character of the Horsleys has remained roughly the same, although property prices have forced many local youngsters to move on and out of the area.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6673</th>
<th>Respondent: 11157121 / D Griffin</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am hereby objecting to any plan to build houses on current greenbelt land. Reclassifying the land is merely sleight of hand.

As to ‘Affordable Housing’, there will never be any truly affordable housing as long as the government (local and central) worships at the altar of Market Forces. Moreover, no normal developer will build affordable houses because:-

a) The price of land (dictated by market forces) represents the majority of the cost;

b) As soon as someone moves into affordable housing, they will think about selling at the market price, thereby instantly converting that house from affordable to unaffordable;

Truly affordable housing requires release of cheap land (not green belt, as this belongs to everybody!), and benevolent developers who can show that they build efficiently, well, and do not make excessive profit.

Finally, the main reason that starter homes are so expensive in the Guildford area, is that so many students live in buy-to-let housing, instead of accommodation provided for them by the University on University land. The University's past practice of selling their land (which they were given free of charge to provide facilities for their staff and students) to commercial developers and speculators, is an absolute disgrace.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The 40% affordable housing allocation is not as demanding as it sounds given that only 10% of private units are one bedroom whereas 40% of the social units are one bedroom. I thought the need for social housing was from young families with children. In any event these have a great acclaim to their own home where is young single people are much more capable of living in shared accommodation and can be more mobile. I would be interested to see how are you arrived at your rather convenient demand analysis.

And as to who qualifies for the social housing this is not clear. In London it can, I believe be available to households with a combined income up to £85,000 which is a long way from what most people would expect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy H2 – SUPPORT WITH RESERVATION:

Whilst Bewley is supportive of the Council’s approach to the identification of an affordable housing requirement and that the level sought (40%) is generally accepted as comprising an appropriate amount having regard to development viability this does further demonstrate the importance of a development strategy that delivers housing in the early years of the plan period. The reason for this view is that the October 2015 SHMA identifies a need equating to some 66% of the total OAN. Where the Council is seeking to adopt a policy requiring 40% on sites of five or more homes the level of affordable housing need identified in the SHMA will never be fully met. Early delivery to help secure affordable provision as soon as possible is therefore vitally important within the Borough.

Paragraph 4.3.13 – OBJECT: UNSOUND – Not Positively Prepared, Justified or Consistent with National Policy:

Bewley does support the release of settlements from the Green Belt and in turn the proposed allocation of new housing land in or immediately adjacent to these settlements. However, and for the reasons explained in the representations below, the Council needs to release further land from the Green Belt to meet its housing obligations and ensure flexibility in its development strategy for the whole of the plan period.

The Green Belt and Countryside Study prepared by Pegasus on behalf of the Council in January 2013 clearly identifies significantly more capacity within the Green Belt for land release than the Council has sought to include within the Plan. Furthermore the Green Belt and Countryside Study has taken an extremely narrow approach to the review of the Green Belt boundaries and as a consequence has missed a number of viable opportunities for land to be released for housing that would not cause material harm to the objectives of the Green Belt.

The need for further land release is set out below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Representations Relating to Policy H2 ‘Affordable Housing’

The current thread of Government policy is clearly angled towards delivering a wide range of type and tenure of new housing, along with significantly boosting supply. Therefore, it is essential that local plans acknowledge the Government’s ambitions and seek to deliver the required level and type of housing required for their communities. As required through the tests of soundness, Policy H2 needs to be consistent with national planning policy, effective to ensure delivery over the plan period and also flexible enough to deal with changing circumstances.

Recently, the delivery of housing, especially affordable housing, has altered dramatically with various new proposals aimed at increasing the delivery of housing numbers. This wide range of housing now incorporates products such as starter homes, shared ownership, shared equity, discounted market rent, rent to buy and first buy products, along with market housing and affordable and social rent.

It is considered that, given the wide range of all housing products available, planning policy should be flexible enough to allow delivery of the appropriate mix of tenure and type without being overly prescriptive.

In addition we note that following the order of the Court of Appeal dated 13th May 2016 and the subsequent update to the NPPG, the Council need to amend the policy with regard to the thresholds for the provision of affordable housing – which should no longer be required on schemes of 10 units or fewer:

“There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from scall scale and self-build development. This follows the order of the Court of Appeal dated 13th May 2016, which gave effect to the policy set out in the Written Ministerial Statement on 28th November 2014 and should be taken into account.

These circumstances are that:

- Contributions should not be sought from developments of 10 units or less, and which have a maximum combined gross floodspace of no more than 1000sqm” NPPG Ref. 23b-031-20160519

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford

Thakeham Homes wishes to recommend the site for residential development and as such supports the indicated changes to inset Shalford into the Green Belt in the Pre Submission Local Plan. The red line location plan for the site has been appended to this representation at Appendix 1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18669  Respondent: 11659905 / Thakeham Homes (Anthony Heslehurst)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Representations Relating to Policy H2 ‘Affordable Housing’

The current thread of Government policy is clearly angled towards delivering a wide range of type and tenure of new housing, along with significantly boosting supply. Therefore, it is essential that local plans acknowledge the Government’s ambitions and seek to deliver the required level and type of housing required for their communities. As required through the tests of soundness, Policy H2 needs to be consistent with national planning policy, effective to ensure delivery over the plan period and also flexible enough to deal with changing circumstances.

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28th November 2014 and should be taken into account. These circumstances are that:

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NPPG Ref. 23b-031-20160519

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1212 Respondent: 11716417 / Solum Regeneration (Solum Regeneration) Agent: Nathaniel Lichfield & Partners (Dennis Pope)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Policy H2: Affordable Homes

The 2017 PSLP Policy H2 remains inconsistent with the NPPF and is unsound because the policy itself does not expressly deal with development viability and deliverability, notwithstanding this is addressed within the reasoned justification to the policy (at paras 4.2.34 to 4.2.44).

The latter (4.2.40) recognises that there may be some circumstances where abnormal costs would make scheme delivery unviable and that, where developers demonstrate to the Council's satisfaction that providing the amount of affordable housing required by this policy would not be economically viable, they will accept a reduction in the overall number of affordable homes.

The draft policy continues to rely upon the 2011 Planning Obligations SPD which indicates that, where it is not viable for a development to meet all the requirements of this SPD (i.e. including affordable housing), a flexible approach will be taken by the Council. We consider the approach to be taken where proposed developments- for whatever reason- are found to be unable to support affordable housing at the prescribed 40% level, should be addressed in the policy itself, given the deliverability requirement of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/699 Respondent: 12191873 / Rob Woof Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Recent developments in Send have clearly targeted the affluent commuter and are well beyond the reach of local residents, causing the break-up of family units as our children cannot afford a home in send when they leave the family home. The Local Plan is targeting 40% of all new homes to be affordable housing but as Send is not exempt from the right to buy, affordable housing cannot automatically be secured in perpetuity. So that affordable housing will continue to meet local needs it should be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria,
and finally those with a connection to the borough of Guildford. The homes should not be affordable only to those who commute to jobs in London and have no connection to the community of Send or local employment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/149  **Respondent:** 13707041 / Kirsty Lockie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Whilst I spent 11 years trying to get onto the housing ladder in Guildford myself and can completely understand the frustrations of many that they are unable to buy somewhere, we do not have enough land in this county to keep building new houses on without destroying it completely so consideration needs to be given as to where to draw the line and leave housing as it is. Guildford has already become too large ruining much of it's character and overwhelming it's infrastructure. Please stop trying to grow it even more. One way to stop it's out of control growth is to stop building more homes.

I do believe the area could take some additional homes but not nearly as many as are being proposed. I would suggest less than half and even then the drainage will need to be revamped and the traffic situation will need to be reviewed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/10918  **Respondent:** 13713825 / Barry Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford desperately needs affordable housing - whether it be located on brownfield or green belt sites

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/2475  **Respondent:** 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

GVG is pro—growth and supports good, well designed development. Guildford Town Centre is about to undergo a sustained period of significant development, including creation of an additional 48,000sq m of retail and related space, principally via the redevelopment of North Street. Development includes additional new town centre housing, including
much needed affordable, all of which we support. It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure. It is not clear what public benefits will accrue in the shape of new public space and better public realm. There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Syfield where infrastructure and communications would be better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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2) There is no more housing needed for this part of Surrey.

GBC has gone back on their word that they have listened to the people and have decided to take out much of the housing proposed for the Send area in the first version of the local plan. Yet they have now put in an even bigger number of houses that they labeled 'affordable'. These are not affordable to the young members of this community regardless of what the very cleverly questioned statistics provided. I have talked to many of the young first time buyers in this area and not many of them can afford to buy in the village they grew up in. Many are forced to move to the midlands or further afield due to this house price increase. The GBC is obviously aiming for the London buyers and as Woking is the commuter area and a logical area to attract London buyers they have decided to place Send and the surrounding area into a forced plan which will drive out the local residence and drive up the housing market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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10 POLICY H2 AFFORDABLE HOMES

10.1 I object to policy H2 Affordable homes.

10.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

10.3 In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.
10.4 I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

10.5 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1.1 I object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need.

1.2 “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

1.3 In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

1.4 This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

1.5 GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored. Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/122  Respondent: 15106689 / Joseph Hine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I understand that Guildford borough council needs to provide more social and affordable housing, however I object to the large strategic developments at Wisley airfield, Garlicks arch and Gosden Hill as I fail to see what the requirement for large volumes of affordable and social housing is in the undeveloped areas of the borough where there is no employment, no transport and little services. It would be better to provide more affordable and social housing near developed areas where facilities, and employment opportunities are available and where people looking for affordable homes actually want to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8911  Respondent: 15107297 / Ian McQuattie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

- Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/749  Respondent: 15114721 / Leslie Macnair  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for
not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/255  Respondent: 15120641 / Elizabeth Wolfe  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.7 GBC Affordable Housing Policy H2 is proposing that all development sites (other than those with less than 10 units) will be required to have 40% of their homes offered as affordable housing. This to be on all site irrespective of where they are or where the homes are most needed. Local authorities are able to take payments in lieu from developers, but GBC have rejected this option. Why? This “one size fit all” policy will mean that homes will be built where they are not needed and not enough will be built where they are needed. Developers are therefore able to influence the level and type of affordable homes built. The housing mix in the Local Plan suggests more 1-bed homes should be built than 2-bed. GBC have ignored the figures from their own needs data (where more 2-bed homes are needed) in favour of those produced by their external consultants report. These reports have been influenced not by sound internal data from their housing records but by the vested interests of the development lobby. The only changes that can be made to the number on each site is at the developers discretion and at their request. GBC are unable to promote changes.

1.8. If any affordable social housing is built in a village like East Horsley and on most of the sites in West Horsley they could be lost to the market as there is no rural protection against the right to buy or enfranchise.

1.9. Most of the social housing in EH has already been lost as a result of right to buy. GBC should take payment in lieu from developers and build the social affordable home in more urban areas where they are most needed.

1.10. GBC’s new policies will encourage the buy to let investors who will receive a good return on their investment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/368  Respondent: 15136097 / Peter Fava  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I note that despite receiving 20,000 objections to your local plan in 2014 you managed to put an upbeat video on your website supporting your local Plan. It also expressly states the need for affordable housing. Why then do you only allow the building of expensive three/four bedroom houses in the area? A development of affordable houses, backed by a Housing Association in Send, would amply qualify for your support according to your video. To conclude, we need more affordable housing and not expensive big houses which only benefit the local developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Whilst accepting that some new houses are needed, especially smaller properties for people wanting to downsize, the current pattern seems to be to allow small properties to be demolished and huge properties built in their place.</td>
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<td>I have regularly been dismayed to discover that these developments with the promise of ‘affordable housing’ are far from ‘affordable’ with very little chance of young families, or local people being able to afford them.</td>
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Policy H2 Affordable Homes

It is acknowledged that affordable housing in the Borough is much needed and this is supported, however an important issue when considering affordability is that housing should be provided to meet with need (the objectively assessed need) which does not solely focus on affordable housing and should be open to the consideration of arrange of tenures, consistent with Government policy. Local authorities need to ensure that sufficient market housing is provided as this will mean that more people can own their own home and house prices in general will be lowered. If affordable housing thresholds are set too high it will preclude valuable sites from coming forward, which will perpetuate the issue of a lack of housing in the Borough, thus continuing to drive prices high on the basis that supply does not meet demand or need.

The characteristics of Guildford also need to be considered. It is a Borough where 85% of the dwelling stock is owner occupied; therefore whilst there is an affordable housing need this needs to be balanced with its population’s desire to own their own home and to work with the provision of private rented, discounted private rented and other models of housing delivery.

The policy should not require the provision of land for affordable homes at nil value. This is an inappropriate and unnecessary intervention in the market and will affect viability and hence delivery of homes. The key policy requirement is the provision of an increased level of housing to meet OAN and to meet the requirements of affordable homes, starter homes and private rented stock. There are a variety of models available for the supply of housing, including discounted market rent and affordable rents and for starter homes and other initiatives.

We do not believe that specialist housing should contribute towards affordable housing provision. Such accommodation (care homes / students halls etc) tend to be provided by specialist providers who would not be attracted to the Borough if they were required to provide onerous affordable housing contributions yet they make a very important contribution to the diversity of housing stock in the Borough and help ensure that all local needs are met.

We do however support that affordable housing provision is subject to viability. Though, by artificially and unnecessarily lowering the thresholds of provision to levels that realistically will not be achievable the Council are developing a policy which means that viability will be a standard practice for all development; whereas it should only apply in some cases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
housing records but by the vested interests of the development lobby. The only changes that can be made to the number on each site is at the developers discretion and at their request. GBC are unable to promote changes.

1.8. If any affordable social housing is built in a village like East Horsley and on most of the sites in West Horsley they could be lost to the market as there is no rural protection against the right to buy or enfranchise.

1.9. Most of the social housing in EH has already been lost as a result of right to buy. GBC should take payment in lieu from developers and build the social affordable home in more urban areas where they are most needed

1.10. GBC’s new policies will encourage the buy to let investors who will receive a good return on their investment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1019  Respondent: 15189377 / Anne Butler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Affordable housing is indeed required in our area but it needs to be in the appropriate location – where people work & want to live. There also needs to be good protection so that the properties are not taken out of the ‘affordable’ stock by investors. I did not see any such protections in the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1041  Respondent: 15192545 / M & JB Koskela  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No guarantee of enough affordable housing for young families

Please take into account our concerns listed above when considering your plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1250  Respondent: 15207553 / Supergonk (Ben Ward)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We are a very small company that offers co-working facilities to technology professionals in the Guildford area. We are based on the Surrey Research Park, and work within a large network of independent games developers and creative tech professionals that are based in wider Guildford area.

This network comprises mainly of young people, they are not well paid, they take risks with their time to drive the games and technology sectors forward in the area, and they are not close to the planning processes that defines the future of Guildford.

I am writing you to say that common issues with this group of young people is the lack of accessible and affordable housing.

I understand that the local plan that is now subject to a consultation has land allocations for housing across range of prices and accessibility and, for those companies that will emerge from our network, land for the growth of employment, as well as improvements to the infrastructure to support development.

Based on this understanding I am writing to support this plan, and encourage the council to do all they to improve access for young people to affordable housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13735  **Respondent:** 15227905 / Nigel Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
• The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2301  **Respondent:** 15244097 / Persimmon Homes (Craig Hatton)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )**

Please refer to the attached representations in the section titled "Policy H2: Affordable Homes" for our comments in detail

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
This representation has been prepared by Persimmon Homes and constitutes Persimmon Homes Limited's formal response to the above consultation. These representations cover our responses to two policies which are included within the emerging Local Plan. As part of the Persimmon Group, the company represents one of the largest house builders in the UK and is a significant stakeholder with a vested interest in the long-term future of Guildford Borough.

**We would like to submit the following representations on the Local Plan and we would welcome, in due course, participating in hearings of the Examination in Public.**

**Policy H2: Affordable Homes**

The policy is unsound because it is contrary to national policy: the increase proposed is not supported by evidence and is unjustified.

This policy states that "on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes. At least 40 per cent of the homes on these sites must be affordable homes". This equates to at least 5,544 affordable dwellings over the plan period.

Persimmon Homes accept that there is a need for affordable housing as part of residential development within the borough. Persimmon Homes are also willing to contribute positively to assist in increasing the supply of affordable housing within the borough.

Guildford is subject to a number of significant constraints to housing development such as the high level of Green Belt land which limits the amount of land available for development that does not carry this designation. It is important that, given Guildford's housing needs of 693 dwellings per annum, the Borough remains an attractive proposition for developers in order to deal with this challenging housing need. The West Surrey Strategic Housing Market assessment (SHMA) highlights that across the Housing Market Area (HMA), comprising Guildford, Woking and Waverley, it is Guildford which has the highest level of under-supply with a shortfall of 419 dwellings against its housing requirement.

There is, therefore, a concern that Guildford will struggle to achieve the housing requirement, or close to it, due to a pre-existing under deliver on a housing requirement of 322 dpa which is significantly lower than the need as set in the emerging Local Plan of 693 dpa.

It is understandable that an increasing housing requirement will naturally lead to an increasing affordable housing target, however we do not believe that this warrants a 15% increase in affordable housing provision. The Local Plan 2003 set out a requirement of 25% of all new developments to provide affordable homes. This was supplemented by the Planning Contributions Supplementary Planning Document (SPD) which set the affordable homes requirements at 35% in 2011. Using this as a starting point, there is insufficient evidence to justify an increase up to 40%. By increasing the affordable housing requirement this will jeopardise delivery. Guildford has shown under-delivery with the affordable homes requirement of initially 25% and then subsequently 35% and so there is no evidence to show that delivery will increase sufficiently to justify a further rise in affordable homes requirements. Any increase will impact on the viability of schemes which are already challenging to achieve within the Borough. Until Guildford can show a reasonable rate of delivery over a sustained period of time then there can be no justified reasoning behind increasing affordable homes requirements.

We would advocate that the Council should keep the affordable housing requirement at a maximum of 35% as stated within the Planning Contributions Supplementary Planning Document (SPD). The Council must deliver housing and development sites must therefore be considered to be viable. Any increase in affordable housing requirements would have a detrimental impact on the delivery of housing sites, which at this point Guildford cannot afford to do. The
increase in housing requirements from the interim figure from the Local Plan 2003 of 322 dpa to the newly established 693 dpa in the emerging Local Plan will be even more challenging to deliver given the limitations on available land and the costs of acquiring land in the south-east and particularly the Surrey commuter belt. These factors must be considered when establishing if a scheme is viable and an addition of a largely unjustified increase in affordable housing requirement will only exacerbate issues of delivery and impact on the viability of such sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1731  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

**POLICY H2- Affordable homes**

I OBJECT . "Affordable" homes, under national definitions, means homes that are sold or rented at 80% of market value . Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people's means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable . Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government's policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy's version of "affordability" is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1763  Respondent: 15245313 / C.A. Lindsay  Agent:

**H2 Affordable homes**

This policy's version of "affordability" is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to this supposed provision, because 'affordable' doesn’t really happen in Guildford. The policy for the provision of affordable homes should be taken seriously, strengthened and given much, much greater importance. We have a personal, family knowledge of this situation where a young family is living in unsuitable accommodation. Trying to cope in unsuitable accommodation puts a huge extra strain on the hard-working parents, who earn average salaries but still can not afford anything more, and even though they do their best to minimise the disadvantage to the children, it affects the children badly. This is what their lives will be founded upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY H2: Affordable Homes

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this 'one-size-fits-all' policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

I accordingly OBJECT to Policy H2.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17664  Respondent: 15256225 / Boyer (Michelle Thomson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

11.3 Policy H2 of the Proposed Submission Local Plan states that affordable housing will be provided:

“on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes. At least 40 per cent of the homes on these sites must be affordable homes; and On development providing solely affordable housing either on public sector-owned land or developments by registered providers”

11.4 This is contrary to the recent national guidance published in the National Planning Practice Guidance which states that “contributions should not be sought from development of 10 units or less, and which have a maximum combined gross floorspace of no more than 1000 sqm” (Paragraph 31; Reference ID: 23b-031-20160519).

11.5 Policy H2 does not therefore comply with current planning guidance and the Council has failed to provide any justification to support this approach.

11.6 In addition no justification has been provided for the 0.17ha threshold which the Council has set out in this policy and it is noted that the ‘Guildford Borough Council Local Plan Viability & Affordable Housing Study’ which is a key evidence document in relation to this policy was produced in December 2014 prior to the production of the ‘West Surrey Strategic Housing Market Assessment’ in September 2015.

11.7 For the Local Plan to be found sound at examination the Council should therefore demonstrate how this policy has taken into account the latest SHMA and NPPG Guidance.

11.8 The wording of Policy H2 should also be revised. The proposed wording set out in the Proposed Submission Local Plan states that “The tenure and size of affordable homes provided on each qualifying site must contribute, to the Council’s satisfaction, towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment 2015, or subsequent affordable housing needs evidence.”

11.9 The term ‘to the Council’s satisfaction’ is not a technically defined term and introduces ambiguity into the assessment and determination of future planning applications. The wording of Policy H2 should therefore be revised to remove this phrase and ensure the policy is justified.

11.10 Further consideration should also be given to the wording of the supporting text which relates to Policy H2. In particular paragraph 4.2.39 states that developments will be expected “to provide the required amount of affordable housing in accordance with this policy and Guildford Planning Contributions Supplementary Planning Document (SPD).” However paragraph 4.2.37 states that the Planning Contributions Supplementary Planning Document 2011 will be revised.

11.11 The Council should therefore demonstrate how this policy will be implemented in the absence of an updated Planning Contributions Supplementary Planning Document and set out the proposed timetable for these works to ensure the soundness of the plan.
11.12 Given that the Council have not yet adopted a Community Infrastructure Levy (CIL) Charging Schedule for the Borough the Council should also demonstrate how the affordable housing requirement set out in Policy H2 takes into account this potential additional cost to development.

11.13 It is noted that the ‘Preliminary Draft Charging Schedule’ for the Borough was consulted on between January and March 2015 after the production of the ‘Guildford Borough Council Local Plan Viability & Affordable Housing Study’.

11.14 The Council should therefore justify this approach to demonstrate that the affordable housing requirements set out in Policy H2 are underpinned by a robust viability appraisal across the Borough.

11.15 Policy H2 also fails to make any reference to ‘Starter Homes’ which it is considered should be a consideration of the Proposed Local Plan given the timetable for examination and adoption. To ensure the soundness of the plan it is recommended that reference to ‘Starter Homes’ is made to ensure the Local Plan is not out of date in policy terms upon adoption.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2028  **Respondent:** 15257665 / Colin Leyden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

I wish to congratulate the Council on this plan which I found to be extremely thorough and well thought through. I am particularly interested in the plans for Affordable Housing. I write to state that I am in complete agreement with the Council's proposed plans. I have lived in the Guildford area for over 10 years. I have a young family living in a one-bedroom accommodation and cannot afford to buy a property with the additional bedroom that I need for my young daughter. I very much hope that the Council's proposed plans to increase the number of affordable homes is adopted.

The Council's plans have my full support.

Colin Leyden

13th July 2016

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2250  **Respondent:** 15263425 / Rosemary Napp  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The policy of at least 40% affordable homes is strongly supported. I oppose government policy that this percentage need not be applied to less than 10 homes developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2154  Respondent: 15267649 / The Northumberland Estates (Guy Munden)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Policy H2 requires affordable housing to be provided on sites providing five or more dwellings. This is considered to be contrary to national planning policy guidance issued by the government. In 2014 the Secretary of State for Communities and Local Government announced that there would not be a requirement to provide a contribution to affordable housing for development of 10 dwellings or fewer. This announcement was subject to judicial review, however in May 2016 a Court of Appeal judgement restored the policy which means that affordable housing cannot be sought on sites of 10 or fewer dwellings. It is considered that Policy H2 should be updated to reflect the Court of Appeal judgement and the latest government guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2269  Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

Even after the 20% reduction, these 'affordable' homes (using average prices and wages for the area) will be ten times the average salary! Given the level of infrastructure that has been earmarked for delivery by developers the affordable housing is unlike to be built at the levels put forward and may not be produced at all.

The term 'affordable' is also misleading in areas such as Guildford.
34. RPC is very well aware of (and supports) the need to provide new affordable housing to serve existing and growing rural communities but the creation of isolated new or extended settlements of principally market housing as the basis for generating supply of affordable housing is misconceived and it is noted that, in any case, it does not remotely amount to sufficient affordable housing to meet local need. Guildford Borough has some of the highest costs of housing in the country, so that 80% of market value still remains unaffordable to many workers in the area.

35. Affordable housing in rural areas should be provided in or close to the settlements that it is going to serve, rather than as ad hoc adjuncts to larger new market housing developments. Such new development has historically been absorbed largely in or on the edge of rural settlements. Extensive and substantial new market housing areas in unsustainable locations causes irreversible harm to rural character, congestion and danger on rural road network and damage to social cohesion.

36. RPC considers that new housing, both market and affordable should be achieved close to and within major urban areas, principally in Guildford itself where high density housing can be provided on previously developed land close to services, shops and employment. Such an approach would be consistent with the principles of sustainable development in the NPPF. The current distribution strategy proposals are directly contrary to the principles of sustainable development in the NPPF.
This assertion is questioned. Such assessments are made throughout the country by planning authorities when setting their affordable housing targets, yet they are invariably proved to be wrong with independent viability assessments demonstrating that abnormal costs far exceed what was originally assumed (primarily due to an understandable lack of knowledge at the strategic assessment stage). As a consequence, developments invariably provide significantly less affordable housing than policy requires, and the most recent figures (October 2014 to October 2015) show a net addition of just 118 affordable homes in Guildford Borough *, which indicates that this is very much the case at a local level.

* These figures are sourced from a DCLG dataset published in December 2015 to support the provisional 2016-17 allocations for the New Homes Bonus.

Miller contends that in Guildford far too little is known about the costs associated with bringing forward the strategic housing sites to provide any confidence that the Council can secure the 40% level of provision. In particular, the Borough Council and Highways England have still to agree the details of the Road Infrastructure Strategy (see comments on RIS schemes) and the details of the proposed Sustainable Movement Corridor (SMC) are far from being confirmed, let alone costed (it is noted for example that the SMC is reliant on new stations at Park Barn and Merrow but there appears to be no commitment to these stations in the Rail spending programme). These ‘unknown’ costs will be borne by the developers and will undoubtedly affect the viability of these developments with the clear consequence of seeing the affordable housing contribution (one of very few negotiable costs) being reduced.

If the Council is to deliver any significant level of affordable housing it must bring forward a greater number of housing allocations that are not overly burdened by high infrastructure costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2495  Respondent: 15282593 / Anne Young  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

So called affordable housing will never be affordable round here and it disappears after the initial sale anyway. The only thing that will make any difference to securing housing for the ‘ordinary person’ in the Guildford area is building social housing, and not giving it away some time down the line. Justifying building high end housing estates in order to obtain a few 'affordable houses' is in my opinion short-sighted, shameful and not to mention immoral, and leads one to question who is actually benefitting from it?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10942  Respondent: 15282625 / Kelly Graves  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

• Using the official definition of Affordable is in appropriate - houses in the area are and will remain unaffordable homes - a drive for more homes will just means a drive for more income from development.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.
  
  • The viability clause lets developers off the hook of providing even these (non-)affordable homes. Too open to manipulation.
  • Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2787  Respondent: 15298849 / Elaine Burns  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

HOUSING POLICIES

POLICY H2: Affordable Homes

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However I object to this policy as GBC have taken no regard to the differences in affordable housing need across the borough. Under Policy H2, 40% of all but the smallest development sites in East and West Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14073  Respondent: 15299201 / Samira Abdullah  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and
development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2811  Respondent: 15299361 / Jane Finlay  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We need LOW COST housing schemes and small developments to meet local need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2822  Respondent: 15299425 / Tim and June Yorath  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2 – Affordable homes

We object to this policy on the grounds it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non- development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2876  Respondent: 15301089 / Brian Yeomans  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an 'affordable home' is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will 'affordable homes' be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3430  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY H2 – Affordable homes

- Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3143  Respondent: 15323041 / Jane Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this 'one-size-fits-all' policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.
In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement - a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

I accordingly OBJECT to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3305</th>
<th>Respondent: 15327905 / Julia Cook</th>
<th>Agent:</th>
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POLICY H2 – Affordable homes

I OBJECT. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally.
Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/2077</th>
<th>Respondent: 15348481 / Donna Styles</th>
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The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/4033</th>
<th>Respondent: 15352065 / Daniel Sinclair</th>
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The affordable homes policy is laudable but GBC are planning on building them in the area of least demand where transport links are not good and there are limited jobs. In fact the demand in the village is for affordable three bed homes, contrary to what BC have outlined. The plans fail the test of sustainability on many counts, including this one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/4206</th>
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</table>
As a resident in Guildford area for the last 13 years, I mainly welcome the plan of developing new affordable houses. 

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4620  **Respondent:** 15370593 / A Gee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
POLICY H2 – Affordable homes

GROUNDs FOR OBJECTION. “Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4919  **Respondent:** 15380289 / Stephen Hewlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. No proper affordable housing (Where is the housing for poor people!!)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/4940  **Respondent:** 15381089 / Tim Poyntz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

13. POLICY H2

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And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5156  **Respondent:** 15386337 / Edna Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1637  Respondent: 15388641 / Eva Hay  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy says: "Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site."

This means that the developer doesn’t even have to provide any ‘affordable’ homes, but just to make a negotiated payment to the Council. I doubt this is likely to result in the construction of any ‘affordable’ homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5198  Respondent: 15388673 / Bruce Stewart  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/388  Respondent: 15397793 / Sheila Collins  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5480  Respondent: 15398657 / Kim Roberts  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H2
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5656  Respondent: 15405857 / Raymond Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5685  Respondent: 15406017 / Eleanor Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/297  Respondent: 15406145 / Paul Moore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that "Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says:  Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site."
So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5717  Respondent: 15406529 / David I Allan  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

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Attached documents:

Comment ID: PSLPP16/5731  Respondent: 15406593 / Guy Whatley  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I also object to the type of houses that will be built. The council mentions 'affordable housing' but I am single and in my late twenties, have worked continuously since I left College at 17, but am in low-paid employment. I am unable to afford any type of housing, rented or otherwise in this area, and this plan to offer a small amount 'affordable housing' will not be affordable to me, or others like me. Someone has to man the shops and clean the floors of your offices, empty the bins and work in the coffee shops. Those people will not be able to live in the housing intended though.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of £360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6206  Respondent: 15426305 / I C Dean  Agent:

Policy H2 – Affordable homes

I object to this policy.

It should be more firm and explicit on “unviability” in paragraph 4.2.40. The possibility of avoiding or reducing the affordable housing obligation through use of unviability arguments is likely to inflate land values and lead to appeals. Guildford's popularity and location in the Green Belt, with the Surrey Hills, close to others towns and within the London Commuter belt mean that demand is virtually unlimited and no amount of affordable housing will meet it. The real need is for social or “council” housing but that will not be provided by current developer-led models.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6269  Respondent: 15427617 / Ken Scotland  Agent:

Policy H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility, and that it should be more firm and explicit on unviability in paragraph 4.2.40.
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It should be noted in the Plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of over £360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/728  **Respondent:** 15432705 / Gordon Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate?**  ( ), **is Sound?**  ( ), **is Legally Compliant?**  ( )

**I object the change in policy on affordable homes (Policy 4.2.23)**

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: **Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.**

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) **“In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost i.e. a reason for not delivering affordable houses”**. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/397  **Respondent:** 15434433 / James Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate?**  ( ), **is Sound?**  ( ), **is Legally Compliant?**  ( )
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6777  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY H2 – Affordable homes

• Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable! Pushing for these homes just means pushing for more development.
• The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6912  Respondent: 15440609 / S Trower  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

What is needed in West Horsley are affordable homes. This was proven by The West Horsley Parish Council Housing survey and local plan in 2014. All new housing in the village seems to be 4 and 5 bedroom executive homes, usually following the demolition of a smaller home, which brings in a 2 (or more) car family placing extras strain on the village infrastructure. The WHPC survey indicated that there is little scope for older people to downsize, or for starter homes for children born and brought up in the village.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7049</th>
<th>Respondent: 15442049 / Ellouise Fassom</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
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It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/7050</th>
<th>Respondent: 15442081 / Lauren Fassom</th>
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Attached documents:

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Comment ID: pslp171/2024  Respondent: 15442561 / Tegan Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The policy says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

This means that the developer doesn’t even have to provide any ‘affordable’ homes, but just to make a negotiated payment to the Council. I doubt this is likely to result in the construction of any ‘affordable’ homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7144  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

13. POLICY H2

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In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of over £360,000 the discounted price is still not going to be affordable to anyone on a normal income.

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**Attached documents:**

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**Comment ID: PSLPP16/14359  Respondent: 15446401 / Louise Yandle  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
• The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: pslp171/1418  Respondent: 15446753 / David Boyce  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.
Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7421  Respondent: 15448321 / Nicole Mapplebeck  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

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Comment ID: PSLPP16/7422  Respondent: 15448353 / Emily Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
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Comment ID: PSLPP16/7423  Respondent: 15448385 / Edward Bates  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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Comment ID: PSLPP16/7425  Respondent: 15448449 / Carol Roberts  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
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Attached documents:
Whilst there is a need for affordable homes, I feel the scale being proposed goes over and above the national need, and will require even further development of commercial, industrial and road construction - all of which will increase the irreversible damage to our countryside. Surely we have to set limits and not be seen as NIMBYs but actually people who care about what environment we are leaving for the generations to come?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7778  Respondent: 15452193 / Susan Hibbert  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also feel that the type of development has not been sufficiently thought through; in the town centre we need homes rather than yet more shops and, in particular, more affordable starter homes for young couples and specialised housing for the elderly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8007  Respondent: 15457953 / Ian Symes  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

H2: Affordable Homes:

The 40% affordable housing target is far too high a figure for building outside urban areas. This should be set at a more practical 30%. If it were set at this lower level, there would be more room to reduce the overall housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8011  Respondent: 15458081 / K C Meldrum  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2- the policy should require that a proportion of smaller houses should be built as well as smaller apartments. Developers prefer larger houses but there is great demand in Guildford for smaller houses as starter homes or for older people who wish to downsize.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8125  Respondent: 15461601 / Nicholas Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing Policy H2 - Affordable Homes

I currently live with my parents. I would very much like to own my own home, preferably in the Horsleys, but the prospect of that happening in the foreseeable future is very unlikely.

Under Policy H2, 40% of all but the smallest development sites will be required to have affordable housing built on them. However, property prices for any new development will reflect the prices of the established property market of the area. Developers need to see a return on their investment. For the Horsleys this will mean that ‘affordable’ homes will not be affordable to those who need them most.

In the Local Plan nearly 400 houses are proposed to be built in West Horsley, which is excessive compared to the current layout and character of the village. They are also designated to be in the Green Belt (which I object to). This in itself would put a premium on houses in the new development as encroachment on to Green Belt has to be justified. Proposals to have higher housing densities than those for the rest of the village, to enable a percentage of ‘affordable’ homes to be achieved, seems self-defeating.

Affordable homes therefore need to be where they are most needed and economically viable. Far more can be built in an urban setting where mass and height are not as much of an issue as in rural areas. The Local Plan has proposed relatively small amounts of development for the Guildford urban area compared to the surrounding villages and it would appear that most of the available brownfield sites in the town have been put aside for business and retail use. With many more businesses opting for internet trade from small offices/homes, this seems a wasted opportunity to use valuable brownfield sites to address the affordable housing needs.

I therefore OBJECT to Policy H2. It needs to be revised so the provision of affordable housing meets the needs of those who need it most in areas where it is most useful and sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8360  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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<td>Will building 5 bedroom houses for the uberwealthy really help our younger generation get on to the property ladder. i don’t think so</td>
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Attached documents:

Comment ID: PSLPP16/8703  Respondent: 15475041 / Anne Geary  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this 'one-size-fits-all' policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough in an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

In summary then, I object to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8912  Respondent: 15478017 / Kirstie Pankhurst  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9019  Respondent: 15478177 / Michelle Brown  Agent:

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In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will 'affordable homes' be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15902  Respondent: 15478209 / Sally Daboo  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/537  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9328  Respondent: 15481409 / Amy F Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

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<td>More affordable housing is required using brown field sites within the town. Not more shops! Green belt developments tend to be large properties which will not assist the people that the Local Plan is designed to help.</td>
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<th>Comment ID: PSLPP16/10027</th>
<th>Respondent: 15495873 / Gerard Duvé</th>
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<th>Comment ID: PSLPP16/10550</th>
<th>Respondent: 15504001 / Margaret Banks</th>
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Comment ID: PSLPP16/10627  Respondent: 15504577 / Indigo Planning Limited (Michael Wood)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2: Affordable housing

- The PPG at Paragraph 020 states that planning obligations should not be implemented where they would make a development proposal It is emphasised that this is particularly relevant for affordable housing contributions.
  Without reference to viability and affordable housing, Policy H2 is currently in conflict with this element of the PPG. We suggest the following sentence be added to the policy text:

  “Proposals departing from these requirements will be expected to justify any lower provision through the submission of a financial viability appraisal”.

- Whilst we appreciate that this provision is set out within the supporting text to the policy, in order to be implemented as part of the policy it must form part of the policy text

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11073  Respondent: 15509057 / Richard Golding  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East and in a short journey time to London means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. And when the planning applications are lodge the bulk will be for 4/5 bedroom properties and the planners will not be able to resist this.

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<th>Comment ID: PSLPP16/15333</th>
<th>Respondent: 15571201 / Zoe Dudgeon</th>
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<th>Comment ID: PSLPP16/11436</th>
<th>Respondent: 15571425 / Monika Neczaj</th>
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I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

- Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

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<th>Comment ID: PSLPP16/11481</th>
<th>Respondent: 15571553 / Darren Carbine</th>
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POLICY H2 – Affordable homes - I OBJECT.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable.

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<th>Comment ID: PSLPP16/11773</th>
<th>Respondent: 15571617 / Bruce Garbutt</th>
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POLICY H2 – Affordable homes

I object to this policy on the grounds that it should be more firm and explicit on “unviability” in paragraph 4.2.40. The possibility of avoiding or reducing the affordable housing obligation through use of unviability arguments is likely to inflate land values and lead to appeals. In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

Guildford's popularity and location in the Green Belt, with the Surrey Hills, close to others towns and within the London Commuter belt mean that demand is virtually unlimited and no amount of affordable housing will meet it. As I understand it, “affordable” homes are defined as those with a value of 80% of the market value. In a high house-price area such as Guildford, that still may not be truly affordable to many.

Paragraph 4.2.3 (in Policy H1) states that the SHMA has calculated that 70% of the affordable homes needed are 1 and 2 bedroom dwellings. In Guildford town centre there are at least 6 sites, covering around 2 hectares (5 acres), that are derelict or used as surface car parks, some for decades, yet the Council appears to have had no success in redeveloping these at all. They have the potential to be used as mixed use town centre projects which could include apartment accommodation of this size. Not all of them are even included in the current Plan.
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

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In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1678</th>
<th>Respondent:</th>
<th>15585409 / Vanessa Styles</th>
<th>Agent:</th>
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<tbody>
<tr>
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I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”
So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

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Attached documents:

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford’s relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

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Attached documents:

Comment ID: PSLPP16/12899  Respondent: 15587137 / John Oliver  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H2 AFFORDABLE HOMES

I object to policy H2 Affordable homes.

‘Affordable’ homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of ‘affordability’ is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

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Attached documents:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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**Policy H2**

These are much the same arguments as in Policy H1. Guildford’s affordability ratio is astronomical compared to the rest of the UK. In general terms, young people simply cannot afford to live here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13247  **Respondent:** 15588929 / Alex Hutchings  **Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY H2**

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**Comment ID:** PSLPP16/13394  **Respondent:** 15590273 / Eunja Madge  **Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: pslp171/1549  Respondent: 15591585 / John Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

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Comment ID: PSLPP16/13772  Respondent: 15595489 / Michael Crates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

16. I object to Insufficient affordable housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13815  Respondent: 15596065 / Maryjane French  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We need affordable houses NOT luxury 5 bedroom houses that draw more people out of London! We need them built on brownfield sites. This should be at the heart of the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13842  Respondent: 15596545 / Nye Morgan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the provision of more affordable housing on Brownfield sites and within town boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13845  Respondent: 15596609 / Della Morgan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
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Comment ID: PSLPP16/13895  Respondent: 15598113 / David J. Blackbourn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**Comment ID:** PSLPP16/14166  **Respondent:** 15601217 / Patrick Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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**Comment ID:** PSLPP16/14165  **Respondent:** 15601249 / Ann Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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Comment ID: PSLPP16/14257  Respondent: 15601953 / Stephen Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
• The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14310  Respondent: 15602177 / Julia Hunt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14815</th>
<th>Respondent: 15607553 / Penelope Gillmore</th>
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Comment ID: PSLPP16/14838  **Respondent:** 15607937 / Joanna Kaminska-Hine  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I understand that Guildford borough council needs to provide more social and affordable housing, however I object to the large strategic developments at Wisley airfield, Garlicks arch and Gosden Hill as I fail to see what the requirement for large volumes of affordable and social housing is in the undeveloped areas of the borough where there is no employment, no transport and little services. It would be better to provide more affordable and social housing near developed areas where facilities, and employment opportunities are available and where people looking for affordable homes actually want to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14879  **Respondent:** 15608289 / Olivia Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.
In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15190  **Respondent:** 15610785 / Liz Vinall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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**Comment ID:** PSLPP16/15332  **Respondent:** 15612481 / Gillian Culmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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<th>Comment ID: PSLPP16/15638</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
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<th>Comment ID: PSLPP16/15637</th>
<th>Respondent: 15618337 / Matthew Pitt</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPP16/15694 | Respondent: 15619041 / Jack Cross | Agent: |
|———|———|———|
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

**Policy H2 - Affordable Homes**

I object that developers can be released from their obligation to provide affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/18689 | Respondent: 15619201 / Michael Conoley Associates (James Deverill) | Agent: |
|———|———|———|
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

**Policy H2: Affordable homes**

The provision of affordable housing is dependent on it being financially viable for developers to build market housing. Whilst the policy notes that affordable housing contributions may be provided off-site, or with payment in lieu where the Council agrees that on site provision is impractical, the 0.17ha site area criterion set by the policy triggering affordable housing provision is so restrictive that many sites appropriate for development will not be financially viable. Therefore, financial viability studies will be required even for the smallest developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15735 | Respondent: 15623745 / Stella May | Agent: |
|———|———|———|
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.
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<th>Respondent: 15636481 / Peta Lawrence</th>
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<th>Comment ID: PSLPP16/16764</th>
<th>Respondent: 15650369 / Stephanie Dean</th>
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I object to this policy on the grounds that it should be more firm and explicit on “unviability” in paragraph 4.2.40. The possibility of avoiding or reducing the affordable housing obligation through use of unviability arguments is likely to inflate land values and lead to appeals. In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

Guildford’s popularity and location in the Green Belt, with the Surrey Hills, close to other towns and within the London Commuter belt mean that demand is virtually unlimited and no amount of affordable housing will meet it. As I understand it, “affordable” homes are defined as those with a value of 80% of the market value. In a high house-price area such as Guildford, that still may not be truly affordable to many. The real need is for social or “council” housing but that will not be provided by current developer-led models.

Paragraph 4.2.3 (in Policy H1) states that the SHMA has calculated that 70% of the affordable homes needed are 1 and 2 bedroom dwellings. In Guildford town centre there are at least 6 sites, covering around 2 hectares (5 acres), that are derelict or used as surface car parks, some for decades, yet the Council appears to have had no success in redeveloping these at all. They have the potential to be used as mixed use town centre projects which could include apartment accommodation of this size. Not all of them are even included in the current Plan.

I object due to the unsuitability of our local roads for heavy vehicles and more traffic including many years of construction traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Draft Policy H2: Affordable Homes

Draft Policy H2 requires that on sites providing five or more homes, or sites of 0.17ha or more, that 40% are to be affordable. The 'reasoned justification', for this draft policy states at paragraph 4.2.35:
This policy applies to all new homes within the C3 Use Class. This generally includes retirement homes, as well as self-contained studio flats for a single household, whether specifically aimed at students or not. It does not apply to residential institutions such as care homes and nursing homes. Assisted living and other sui generis residential developments may be required to make provision; these will be considered on a case-by-case basis.

We object to this draft policy as currently drafted since it does not take into account the viability or provide certainty for emerging models of accommodation and care for older people, such as the presently proposed development of the Site. The draft Policy is therefore not considered 'Effective' in this regard, and therefore fails this test of "soundness".

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

This is a structural issue which affects the delivery of assisted living accommodation for older people at a strategic level. Not looking to achieve parity of affordable housing provision between specialist and mainstream development s is essential to supporting efforts to boost the supply of housing in this sector in line with both national and local priorities. Owing to the further increased costs of redevelopment on previously developed sites, it is therefore considered that Policy H2 should not apply to assisted living developments on previously developed land.

Next Steps

I trust the above is of assistance and request that the submitted Local Plan is updated to reflect these comments on draft Policies AI and H2. I would be happy to discuss with GBC Officers in more detail if requested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17388  Respondent: 15682465 / Nick Beesly  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy H2 "Affordable Homes" imposes a high obligation on developers for affordable housing but makes no reference to viability. If we are unrealistic about expectations of what developers must provide it will limit the supply of new homes and increase the cost of those that are built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17596  Respondent: 15688481 / Sally Lescher  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
normal cost of development and mitigation, provide competitive returns to a willing land owner and willing
developer to enable the development to be deliverable” (NPPF, para.173).

Whilst GBC have undertaken viability testing of the proposed affordable housing policy requirement, the NPPF and PPG
is clear on the need to recognise viability as a valid planning consideration that should be reflected in policy.

“…The National Planning Policy Framework policy on viability applies also to decision-taking. Decision-taking on
individual schemes does not normally require an assessment of viability. However viability can be important where
planning obligations or other costs are being introduced. In these cases decisions must be underpinned by an
understanding of viability, ensuring realistic decisions are made to support development and promote economic
growth. Where the viability of a development is in question, local planning authorities should look to be flexible in
applying policy requirements wherever possible” (PPG, Ref ID: 10-001-20140306) (Barton Willmore emphasis).

The policy is also silent on the provision of Starter Homes and does not account for the impact this may have on
development viability. Policy H2 should therefore clarify GBC’s planning policy position to Starter Homes and ensure
this is reflected in its viability testing.

In summary, whilst Zurich is generally supportive of the delivery of affordable housing as proposed by Policy H2, they
object to the specific wording of the policy. Zurich therefore invites GBC to reconsider its approach to affordable housing
and ensure the wording of Policy H2 is unambiguous and retains sufficient flexibility in relation to viability
considerations so to avoid the stagnation of residential and mixed use development sites in times of economic downturn.
Suggested wording is set out below:

“…Subject to viability, these affordable homes will be provided:

• on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes. At least 40
  per cent of the homes on these sites must be affordable homes; and
• on developments providing solely affordable housing either on public sector-owned land or developments by
  registered providers…”

Policy H2 also states that “developers will be expected to provide land for affordable homes at nil value”. The Local Plan
Viability and Affordable Housing Study (December 2014) prepared by Peter Brett Associates has not tested the viability
implications of applying a nil land value to affordable housing. In view of the high land values throughout the borough,
Zurich objects to the current wording and would request that GBC alter their approach so to retain flexibility. As an
alternative, whilst the policy may aim for a nil land value, in some circumstances this may not be appropriate and may in
fact stifle development. Zurich therefore requests that GBC revisit their approach and retain sufficient flexibility to ensure
development proposals are not rendered unviable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  BBP-1 Reg 19 Reps.pdf (1.6 MB)
and overpriced public transport system and worst of all the road network, which is already regularly at gridlock in many places with the current volume of commuter traffic.

Instead, existing sites within Guildford town should be re-developed to provide affordable housing, if it really is achievable or necessary at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17768  Respondent: 15701089 / Nick Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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There does not appear to be any framework to ensure that the affordable housing is distributed sensibly within the borough, there is little demand for one bedroom accommodation in an area such as Horsley where the councils own studies show that three bedroom houses are in more demand.

There is also no protection from right to buy which would most likely lead to the accommodation being purchased and sold on for the profit of a select few individuals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17844  Respondent: 15704737 / Sarah Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We need more smaller houses in Guildford. Starter homes with 1 or 2 bedrooms would be better. New developments all appear to be for 3+ homes, many are 5 bedroom homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18330  Respondent: 15717217 / Ian Ferguson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I note in the video the argument on the cost of affordable housing and the inability of staff to live close to their place of employment. I do not think this is a valid reason for building more houses. In my lifetime I have commuted to work and had to find affordable housing as close to my place of work as I could. In an ideal world we would all like to live a short distance from work but in reality this is not feasible or realistic.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18438  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1218  Respondent: 15728289 / Sir Rocco & Lady Alicia Forte  Agent: D2 Planning Limited (Des Dunlop)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H7 – Affordable Housing

We have no objection to the principle of this policy which seeks to provide affordable housing either on site or as payment in lieu offsite. However the provision of affordable housing is subject to viability considerations and such issues are silent within this policy. The reference to viability assessments should and must be included within this policy.

Recommendation
Amend the policy to include reference to viability assessments.
POLICY H2: AFFORDABLE HOMES

Our Client is supportive of the need to make appropriate provision for affordable housing, however, they wish to make the following specific comments in relation to; the viability and justification of the affordable housing target set out within Policy H2.

Compliance with National Guidance

The Council’s policy does not take account of Paragraph: 031 Reference ID: 23b-031- 20160519 of the NPPG.

This states that there are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 20161, which give legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014 and should be taken into account when formulating new policy.

These circumstances are that;

• Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm;
• In designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or No affordable housing or tariff style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty.

1 R on the Application of West Berkshire District Council v Department for Communities and Local Government. Case Number: CO/76/2015

The clear intention and wording of the Ministerial Statement is to ensure that smaller scale development (10 units or less) are not burdened by the need to provide affordable housing or other contributions. This must clearly apply to both financial contributions as well as on-site provision.

For the avoidance of doubt a lower threshold should only be applied in ‘rural areas’ which meet the definition in the Housing Act. This should not include sites within defined settlement boundaries. Our Client cannot, however, see any grounds for a lower target to be applied in the Borough and there is no support for such an approach from the Council’s evidence base.

The Local Plan does not reference the Ministerial Statement and relies on Evidence Base which pre-date the Court of Appeal Decision. The Guildford Borough Council Local Plan Viability and Affordable Housing Study, Final Report,
December 2014 references the relevant National Guidance at 2.2.7 to 2.2.12, however, no justification is provided for setting aside the policy provision.

Type of development

It is recognised at 4.2.35 that affordable housing should only be sought from C3 class uses, however, this should be specifically included in the policy wording.

In addition, whilst the subtext specifically excludes residential institutions such as care homes and nursing homes from the definition of C3 class uses, this should be extended to encompass all forms of elderly and retirement accommodation where there would be assistance provided or a community living environment. This should explicitly extend to the inclusion of care villages and other emerging forms of older housing development.

With the growing needs for older housing over the plan period it is anticipated that the type and form of older person housing will evolve rapidly and the plan needs to be adaptable to change.

Flexibility in the application of the target

Although it is agreed that, where possible, a sufficient level of affordable housing should be provided on site, this should be subject to viability considerations and should be assessed on a site specific basis, taking into consideration other regeneration benefits or sites costs. The policy should include a greater degree of inherent flexibility to specifically recognise the need for reduced levels of on-site provision or off-site contributions on sites that would otherwise be undeliverable.

The Council must be certain that the affordable housing target that is ultimately adopted is realistically attainable and will not hold back development. The policy should also include safeguards to prevent the policy being rigidly applied and being used as a brake on development. Particularly in the early years of the Plan where there will be an onus on housing delivery to address the shortfall.

The Council’s Evidence Base work demonstrates the sensitivity of scheme viability to development assumptions. A key driver is the level of CIL. In the absence of a clear position on CIL it is impossible to reach a conclusion on the impact of setting an affordable housing target. The final CIL charging schedule must be brought forward at the same time as the Local Plan for consideration.

Setting the affordable housing target

We understand the pressing need for affordable housing within the District and overall our Client supports the approach to extend the requirement across a wider range of sites, taking account of the National limitations on sites of 10 units or less. Our Client considers that the threshold should be set at 11 units or more. There is also no justification for setting an additional area threshold of 0.17 hectares.

It is deemed appropriate that the Council have adopted a level playing field by setting a single fixed target, however, the 40% level is deemed unrealistic particularly in the context that affordable housing completions as a proportion of total supply have only hit 31% of the period 2008-2013. This is without the added burden of a CIL charge2.

It is considered that the proportion of affordable housing should remain consistent with the current policy of 35% with clear flexibility written into the policy to reduce this when development would otherwise be unviable. The policy should also clarify that the affordable threshold should be derived on a ‘net increase of units’ to enable the offset of existing housing stock.

Our Client is concerned that Table 5.7 of the Plan Viability and Affordable Housing Study, 2014 shows that on the assumptions of providing 40% affordable housing and an estimated CIL charge of £100 (the lowest preliminary charging level in the Borough) development in Ash and Tongham would not be viable. Given the identification of over 1,300 units in this area

2 Paragraph 3.2.5 of Local Plan Viability and Affordable Housing Study, December 2014.
together with the inherent benefits of developing land outside of the Green Belt this evidence warrants further scrutiny and it is suggested that a reduced affordable housing target is applied to land, including site A28, to ensure that the site will come forward.

**Off-site contributions**

The policy text makes no provision for off-site contributions which will be essential on some smaller and medium size schemes (over 10 units) to ensure that they are workable, viable and ultimately deliverable. To be robust the policy must include a specific mechanism within the policy wording to allow offsite contributions in appropriate circumstances. Reference is made to this at paragraphs 4.2.36 – 4.2.37, however, these provisions need to be specifically included within the policy text.

Any formula must also be consulted and tested and should not be left for publication as supplementary guidance.

It must also be recognised that alternative sites cannot always be identified and it is unrealistic to specify that land values for affordable housing must always be provided at nil value.

It is considered that the statement at paragraph 4.2.38 that ‘the vast majority of development in most locations in the Borough are viable providing an affordable housing contribution of 40 per cent.’ Is misleading. The viability work is based on specific scenarios and it is not considered that this provides a reliable basis for the threshold and percentage adopted. It is also a significant concern that the Council’s viability evidence has highlighted that developments in Ash and Tongham would not be viable.

In order to ensure that development comes forward in the short term the approach outlined at paragraph 4.2.39 may only realistically be applied once the plan, and any CIL charge has been adopted. Where land has been acquired or options signed in advance the Council should adopt greater discretion in negotiations.

Finally, Affordable housing is a dynamic sector and accordingly the Council should ensure that this policy does not prejudice the delivery of; key worker or Private Rented Sector schemes which can make schemes in their entirety more accessible.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Our Client is supportive of the need to make appropriate provision for affordable housing, however, they wish to make the following specific comments in relation to; the viability and justification of the affordable housing target set out within Policy H2.

**Compliance with National Guidance**

The Council’s policy does not take account of Paragraph: 031 Reference ID: 23b-031- 20160519 of the NPPG.

This states that there are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal judgement dated 13 May 20162, which give legal effect to the policy set out in
the Written Ministerial Statement of 28 November 2014. This guidance must be taken into account in formulating a new affordable housing policy.

These circumstances are that;

- Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm
- In designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty.

The clear intention and wording of the Ministerial Statement is to ensure that smaller scale development (10 units or less) is not burdened by the need to provide affordable housing or other contributions. This must clearly apply to both financial contributions as well as on-site provision.

For the avoidance of doubt a lower threshold should only be applied in ‘rural areas’ which meet the definition in the Housing Act. This should not include sites within defined settlement boundaries i.e. Ripley should not be classified as a rural area. In any event out client cannot see any grounds for a lower target to be approved in the Borough, and there is no support for such an approach in the Council’s evidence base.

The Local Plan does not reference the Ministerial Statement and relies on Evidence Base which pre-date the Court of Appeal Decision. The Guildford Borough Council Local Plan Viability and Affordable Housing Study, Final Report, December 2014 references the relevant National Guidance at 2.2.7 to 2.2.12, however, no justification is provided for setting aside the policy provision.

**Flexibility in the application of the target**

Although it is agreed that, where possible, a sufficient level of affordable housing should be provided on site, this should be subject to viability considerations and should, on a site specific basis, take into consideration other regeneration benefits or sites costs. The policy should include a greater degree of inherent flexibility to specifically recognise the need for reduced levels of on-site provision or off-site contributions on sites that would otherwise be undeliverable.

The Council must be certain that the affordable housing target that is ultimately adopted is realistically attainable and will not hold back development. The policy should also include safeguards to prevent the policy being rigidly applied and being used as a brake on development.

The Council’s Evidence Base work demonstrates the sensitivity of scheme viability to development assumptions. A key driver is the level of CIL. In the absence of a clear position on CIL it is impossible to reach a conclusion on the impact of setting a higher affordable housing target than existing.

**Setting the affordable housing target**

We understand the pressing need for affordable housing within the District and overall our Client supports the approach to extend the requirement across a wider range of sites, taking account of the National limitations on sites of 10 units or less. Our Client considers that the threshold should be set at 11 units. Also there is also no justification for setting an area threshold of 0.17 hectares.

It is deemed appropriate that the Council have adopted a level playing field by setting a single fixed target, however, the 40% level is deemed unrealistic particularly in the context that affordable housing completions as a proportion of total supply have only hit 31% of the period 2008-2013 (paragraph 3.2.5 Local Plan Viability and Affordable Housing Study, December 2014). This is without the added burden of a CIL charge.
It is considered that the proportion of affordable housing should remain consistent with the current policy of 35% with
clear flexibility written into the policy to reduce this when development would otherwise be unviable. The policy should
also clarify that the affordable threshold should be derived on a ‘net increase of units’ to enable the offset of existing
housing stock.

Off-site contributions

The policy text makes no provision for off-site contributions which will be essential on some smaller and medium size
schemes (over 10 units) to ensure that they are workable, viable and ultimately deliverable. To be robust the policy must
include a specific mechanism within the policy wording to allow offsite contributions in appropriate circumstances.
Reference is made to this at paragraphs 4.2.36 – 4.2.37, however, there needs to be a specifically included within the
policy text.

Any formula must also be consulted and tested and should not be left for publication as supplementary guidance.

It must also be recognised that alternative sites cannot always be identified and it is unrealistic to specify that land values
for affordable housing must always be provided at nil value.

It is considered that the statement at paragraph 4.2.38 that ‘the vast majority of development in most locations in the
Borough are viable providing an affordable housing contribution of 40 per cent.’ Is misleading. The viability work is
based on specific scenarios and it is not considered that this provides a reliable basis for the threshold and percentage
adopted.

In order to ensure that development comes forward in the short term the approach outlined at paragraph 4.2.39 may only
realistically be applied once the plan, and any CIL charge has been adopted. Where land has been acquired or options
signed in advance the Council should adopt greater discretion in negotiations to ensure that land will come forward in a
timely manner.

Finally, Affordable housing is a dynamic sector and accordingly the Council should ensure that this policy does not
prejudice the delivery of; key worker or Private Rented Sector schemes which can make schemes in their entirety more
accessible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1481  Respondent: 15733697 / Ripley Carriage Ltd (The Burr Family)  Agent: Shrimplin
Brown (James Brown)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally
Compliant? ( )

POLICY H2: AFFORDABLE HOMES

1.52 Our Client is supportive of the need to make appropriate provision for affordable housing, however, they are
concerned that previous comments relating to viability and the justification of the affordable housing target set out within
Policy H2 have been overlooked.

Flexibility in the application of the target

1.53 The revised policy wording still does not include any flexibility to specifically recognise the need for reduced levels
of on-site provision or off-site contributions on sites that would otherwise be undeliverable.
1.54 The Council must be certain that the affordable housing target that is ultimately adopted is realistically attainable and will not hold back development. The policy should also include safeguards to prevent the policy being rigidly applied and being used as a brake on development.

1.55 The Council’s Evidence Base work demonstrates the sensitivity of scheme viability to development assumptions. A key driver is the level of CIL. In the absence of a clear position on CIL it is impossible to reach a clear conclusion on the impact of setting a higher affordable housing target than existing.

1.56 It is considered that the statement at paragraph 4.2.38 that ‘the vast majority of development in most locations in the Borough are viable providing an affordable housing contribution of 40 per cent.’ is misleading. The viability work is based on specific scenarios and it is not considered that this provides a reliable basis for the threshold and percentage adopted.

1.57 In order to ensure that development comes forward in the short term the approach outlined at paragraph 4.2.39 may only realistically be applied once the plan, and any CIL charge has been adopted. Where land has been acquired or options signed in advance the Council should adopt greater discretion in negotiations to ensure that land will come forward in a timely manner.

1.58 There is some recognition in the sub-text at paragraph 4.2.40 that there will be instances where the tenure mix or number of affordable homes requested cannot be met. This flexibility should be specifically written in to the policy text with a clear and reasonable test set out for assessing scheme viability (see below).

Setting the affordable housing target

1.59 It is deemed appropriate that the Council have adopted a level playing field by setting a single fixed target, however, the 40% level is deemed unrealistic particularly in the context that affordable housing completions as a proportion of total supply have only hit 31% of the period 2008-2013 (paragraph 3.2.5 Local Plan Viability and Affordable Housing Study, December 2014). This is without the added burden of a CIL charge. In light of the wider pressures facing housing delivery affordable housing cannot form a further brake on development.

1.60 It is considered that the proportion of affordable housing should remain consistent with the current policy of 35% with clear flexibility written into the policy to reduce this when development would otherwise be unviable. The policy should also clarify that the affordable threshold should be derived on a ‘net increase of units’ to enable the offset of existing housing stock.

Off-site contributions

1.61 It is recognised that the policy does now allow specifically within the policy text for the provision of off-site contributions in certain circumstances, however, this is only where on-site provision would be impractical or the location of the development is unsuitable.

1.62 Any formula for assessing off-site contributions must also be consulted and tested and should not be left for publication as supplementary guidance.

1.63 Finally, Affordable housing is a dynamic sector and accordingly the Council should ensure that this policy does not prejudice the delivery of; key worker or Private Rented Sector schemes which can make schemes in their entirety more accessible.

UNSOUND: The published Affordable Housing Evidence Base is not considered to provide the necessary justification for the 40% target.

It is suggested that the 40% target is reduced to 35%

Flexibility must be included within the policy wording to enable a reduction of on-site provision and/or off-site contributions where these would undermine the delivery of housing supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Draft Policy H2: Affordable Homes

Draft Policy H2 requires that on sites providing five or more homes, or sites of 0.17ha or more, that at least 40% are to be affordable. The 'reasoned justification' for this draft policy previously stated at Paragraph 4.2.35 of the June 2016 Pre-Submission Local Plan:

This policy applies to all new homes within the C3 Use Class. This generally includes retirement homes, as well as self-contained studio flats for a single household, whether specifically aimed at students or not. It does not apply to residential institutions such as care homes and nursing homes. Assisted living and other sui generis residential developments may be required to make provision; these will be considered on a case-by-case basis.

Within our representations to the June 2016 Pre-Submission Local Plan we objected to this Policy. We noted that the last aspect of Paragraph 4.2.35 has been amended in the updated document to state:

Assisted living, extra care and other C2 residential developments may be required to make provision; these will be considered on a case-by-case basis.

Whilst we support the removal of Sui Generis developments from the Policy, our objection to this draft Policy remains since it still applies to assisted living accommodation. Thereby the policy does not take into account the viability or provide certainty for emerging models of accommodation and care for older people. The draft Policy is therefore not considered 'effective' in this regard, and therefore fails this test of 'soundness'.

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

This is a structural issue which affects the delivery of assisted living accommodation for older people at a strategic level. Not seeking to achieve parity of affordable housing provision between specialist and mainstream developments is essential to supporting efforts to boost the supply of housing in this sector in line with both national and local priorities. Owing to the further increased costs of redevelopment on previously developed sites, it is therefore considered that Policy H2 should not apply to assisted living developments on previously developed land.

Furthermore, draft Policy H2 does not currently provide any certainty for developers delivering assisted living, extra care and other C2 residential developments. Draft Policy H2 currently states such schemes 'may be required' to make an affordable housing provision, which will be considered on a case-by-case basis. As such there is no certainty as to whether GBC will seek an affordable housing contribution, which is likely to result in every developer wishing to provide such housing having to undertake a viability appraisal and negotiate accordingly with GBC, adding unnecessary expense and time delays to schemes providing much needed forms of housing.

Draft Policy H2 is somewhat contradictory within the reasoned justification, stating at Paragraph 4.2.35 that it does not apply to residential institutions such as care homes or nursing homes, then in the next sentence stating assisted living, extra care and other C2 developments may be required to make provision. Given that the majority of care homes or nursing homes will fall within Use Class C2, there is no clarity as to whether Policy H2 applies or not in these instances.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1241  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market. GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored.

Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17157  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Stuart Mills)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H2 sets out the Council’s requirements in respect of affordable housing, stating that affordable homes (at a rate of at least 40%) will be provided on sites providing five or more homes, or sites of 0.17 hectares or more, and on developments providing solely affordable housing. Paragraphs 4.2.38 to 4.2.44 of the supporting text to the policy indicate that such provision will be subject to viability considerations, however there is no explicit reference within the policy text itself to a lower provision being appropriate where viability factors would prevent the development coming forward with at least 40% affordable housing provision. In our view this omission creates an element of ambiguity, and risks the policy being considered as contrary to paragraph 173 of the NPPF, which states that such requirements for affordable housing and other developer contributions should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. The policy without such clarification with regard to viability could therefore be regarded as unsound due to inconsistency with national policy.

Proposed Amendments
In order to strengthen the policy and ensure clarity of interpretation, we therefore consider it necessary to add reference
within the policy text itself to the fact that the requirements for affordable housing provision will be subject to such provision being viable, having regard to the guidance on assessing viability set out within the supporting text that follows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17203  Respondent: 15922337 / Andrew Malcher  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The need for Affordable Housing is undeniable, but this is not satisfied by a 10% reduction on the market rate. Families have to split up because the offspring cannot afford to live locally. However the developers who will build on these large ‘new towns’ are not interested in providing ‘affordable housing’. Their sole motivation is profit, and once they get planning permission, they will build the houses that maximise profit, sold to investors and not ordinary families. There are many examples in the locality where developers have wriggled out of the promises they made (for a quota of affordable housing) when contracts were first struck.

The question I ask is, why are these houses deemed necessary?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15559  Respondent: 15977889 / Charles Kimpton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. Defined as sold or rented at 80% of market value, it is unlikely they will be rented at 70%. Starter homes will not be made available for local people and countryside would be lost for no benefit

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1506  Respondent: 16206593 / Bloor Homes (Rebecca Fenn-Tripp)  Agent: Turley (Donna Palmer)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2.35 The Policy seeks sites of 5 or more homes, or 0.17ha or more, to provide at least 40% affordable housing. There is a significant need for affordable housing in the Borough and this is supported by the Council’s evidence base. A Local Plan and CIL Viability Study (October 2016) has been prepared by Peter Brett Associates on behalf of the Council. The Study concludes that:
“Based on the assessment of the policy requirements within the Guildford Borough Proposed Submission Local Plan (June 2016) review, it is considered that the current Plan would not unduly burden the delivery of residential and non-residential development in Guildford borough.”

2.36 No updated assessment has been undertaken to support the current Local Plan consultation and the revised policy requirements. This is considered to be a significant flaw particularly in light of the proposed additional requirements in respect of accessible homes and custom and self-build housing. An updated Study should be commissioned to ensure the proposed policy is justified and effective in light of the revisions proposed to the Local Plan under the current consultation.

2.37 In addition, it is considered that flexibility should be introduced to the proposed policy wording to allow for site specific circumstances where the proposals may be rendered unviable by the level of affordable housing sought. This is particularly likely to be the case where there are non-standard infrastructure requirements to support the development or potential contamination on site. The policy wording should therefore be updated to require provision of at least 40% affordable housing, subject to viability. It is noted that such a mechanism is advocated in paragraph 4.2.40 of the supporting text but not reflected in the policy wording itself.

Policy H2 – The proposed affordable housing requirement is not underpinned by a robust and up to date viability assessment and as such is considered to be unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/210  Respondent: 17241889 / John Hackney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2770  Respondent: 17244321 / James Odell  Agent:
I object the change in policy on affordable homes (Policy 4.2.23)
The previous version of the plan stated that "Developers will be expected to provide land for affordable homes at nil value".

The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council.

Furthermore, the 2016 Plan used to state (section 4.2.40) "In general, a need to make profit over and above the standard developer's profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>is Legally Compliant?</td>
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| The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/543</th>
<th>Respondent:</th>
<th>17288801 / Liz Kirk</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
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</table>
| I believe the addition of at least 12 thousand new homes proposed for the green belt local to Guildford is excessive and unworkable for the environment, community and infrastructure of Guildford. Already the town of Guildford struggles hugely to cope with the number of people driving through its roads. The rush hour currently is horrendous and the whole place frequently descends into chaos if there is bad weather and or an accident. What will life be like with 1000s of more people and their cars!

The roads are congested now, there is not enough parking and Park and Ride is a ridiculous idea as no-one wants to go back and forth on a bus to their car with children and or shopping. After and before work these facilities operate strict opening hours that are unworkable for many.
I appreciate we have to have new homes for people to live in, but building on green belt is not the solution. The local economy will suffer as the congestion will prevent real growth. Our schools and hospitals need expanding more than what is proposed.

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/579  Respondent: 17291553 / James Hitchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/722  Respondent: 17302497 / F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.
Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/743  Respondent: 17303553 / Anita Fitchie  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/767  Respondent: 17303745 / Christine M Macnair  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.


The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<thead>
<tr>
<th>Comment ID: pslp171/918</th>
<th>Respondent: 17316257 / Neeley Jackson</th>
<th>Agent:</th>
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The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

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Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

This is beyond insulting. If affordable housing is not to be provided on the sites allocated by the council then what is the point, where will these houses be built.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: pslp171/1079</th>
<th>Respondent: 17320801 / Terence O'Rourke Ltd for M&amp;G Real Estate (Andrew Elliott)</th>
<th>Agent: Terence O'Rourke for M&amp;G Real Estate (Andrew Elliott)</th>
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The new policy wording offers the potential for affordable housing to be provided off-site, or paid for in lieu where it is agreed that on site provision or management is not practical. Whilst M&G supports these options it should be clarified that viability evidence will still apply in considering whether any affordable housing can be delivered by a development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Whilst M&G supports these options it should be clarified that viability evidence will still apply in considering whether any affordable housing can be delivered by a development.

Attached documents:

Comment ID: pslp171/1031  Respondent: 17325665 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object the change in policy on affordable homes (Policy 4.2.23). The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”. The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” This appears to remove the requirement for developers to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes which is scandalous, particularly in the light of the national concerns over social housing. Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit becomes an acceptable reason not to deliver affordable homes. The Council should be ensuring that it priorities the needs of its local community rather than providing incentives and support to developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1148  Respondent: 17340033 / Guildford Private Renters Association (Nicholas Bragger)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.2.40 – the deleted section should be re-instated. Community benefits are not an excuse to avoid affordable housing, and does more damage to Guildford's community by segregating people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.2.40 – the deleted section should be re-instated. Community benefits are not an excuse to avoid affordable housing, and does more damage to Guildford's community by segregating people.

Attached documents:

Comment ID: pslp171/1323  Respondent: 17372865 / Berkeley (David Gilchrist)  Agent:
Policy H2: Affordable Homes
The Council will be aware that Planning Practice Guidance (Reference ID: 23b-031-20161116) states that:
"There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014 and should be taken into account".

These circumstances include that: "Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm".

We acknowledge paragraph 4.2.40 of the proposed Local Plan that indicated a level of flexibility when it is demonstrated that the contribution would adversely impact the sites viability. To ensure that Policy H2 is deliverable, it is our view that this wording should be included within the text of the policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The affordable housing policy now states that the Council 'will seek' at least 40% of the homes as affordable homes on developments providing five homes or more. The Council are correct to wish to meet their affordable housing requirements however there are occasions when the viability of site delivery can be affected by the requirement for a high provision of affordable homes especially on relatively small schemes. The Council are therefore correct to keep the option for affordable provision relatively open to discussion and, whilst seeking the requirement, there must be an acknowledgement that at times a lower provision may be required. The affordable housing requirement should therefore be discretionary and some element of flexibility allowed for within this policy based on circumstances. The delivery of housing has to be the main target and to compromise the viability of schemes will severely hamper this delivery.

Persimmon Homes are supportive of the inclusion of point 4 within Policy H2 which allows for off-site payments and payments in lieu to be made. This allows for flexibility for the provision of affordable homes and does not restrict the delivery to sites where this may not be practical or could impact on the viability, and therefore delivery, of the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1588  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

POLICY H2: Affordable Homes  

3.10 GVG supports the provision of affordable housing as part of providing mixed and sustainable communities across the borough.

3.11 However, under the second bullet point of policy H2, it states that the Council will seek affordable homes on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes.

3.12 This policy does not reflect the established national policy as set out in the Written Ministerial Statement of 28 November 2014. The Council can only implement a lower threshold, where schemes of six or more dwellings can contribute cash payments towards affordable housing, and tariff style items, in 'designated rural areas' under Section 157 of the Housing Act 1985. GVG is concerned that this policy will have a viability impact on the delivery of important smaller infill sites in the town centre that will contribute towards the successful regeneration of the wider town centre.

3.13 It is therefore suggested that this policy is amended to ensure it is viable, deliverable and consistent with national guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1648  Respondent: 17412193 / Beryl Evans  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I object to the change in policy on affordable homes (Policy 4.2.23)
The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”. The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t have to provide any ‘affordable’ homes - just make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e a reason for not delivering affordable houses].” That has now been removed, thereby implying that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is shocking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1759  Respondent: 17417409 / Lauren Rathbone  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the local plan because Guildford needs more affordable housing for students and young people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1891  Respondent: 17424897 / Peter Sanderson-Byrne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object the change in policy on affordable homes (Policy 4.2.23)

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The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/1912  Respondent: 17426113 / Home Builders Federation (Mark Behrendt)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The Council have included the following statement at the end of part 1 of policy H2:

“These will be provided on developments providing solely affordable housing either on public sector owned land or development by registered providers.”

It is not clear how this statement refers to the preceding sentence which refers to the working with developers and land owners to increase the number of affordable homes. The sentence would appear superfluous to the policy and should be deleted altogether.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp171/1986  Respondent: 17434049 / Lucy Starke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The 2017 version says:  Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes. Furthermore, the 2016 Plan used to state (section 4.2.40)  “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp171/2035  Respondent: 17440705 / Chris Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

If the developer simply builds the development they want and then makes a cash payment to the council for the affordable houses the developer does not build, how does this help Guildford Borough Council build affordable housing? This would appear to prejudice the younger generation and those needing this urgently sought type of housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2122  Respondent: 17445345 / Albury Parish Council (Joanna Cadman)  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 46 4:2:40 Affordable Home

Albury Parish Council recognises the need for Affordable Homes but in order to deliver them it is vital that Guildford Borough Council has firmer controls on developers who flout viability as a reason to avoid building affordable homes. In our view the current wording in this section is too weak.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2303  Respondent: 17456961 / Justine Ayears  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the need for affordable homes within the borough and the inclusion must be firmed up to ensure all developments include the correct ratio of affordable homes and that loop holes previously used to by-pass this provision are closed.

I support the proposals for the mix of affordable homes however the mix of property size and classification of type must be amended to ensure a significantly higher proportion of family homes are included and the number of single bedroom properties are reduced within allocations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2307  Respondent: 17456961 / Justine Ayears  Agent: 

I support the need for affordable homes within the borough and the inclusion must be firmed up to ensure all developments include the correct ratio of affordable homes and that loop holes previously used to by-pass this provision are closed.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy H2 para 4 needs to include that any funds paid in lieu of affordable housing should be ringfenced and the wording further tightened by replacement of “expect” by “will enable”

The tone of many of the policies has been relaxed too much and the words expect, may, should etc must be replaced with words that ensure the policies will be followed rather than the weaker terms that will be exploited are currently used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

On Affordable Homes, the previous version of the plan (Policy 4.2.23) stated that Developers will be expected to provide land for affordable homes at nil value. Now the Plan says “Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of this kind of housing. Furthermore, the 2016 Plan used to state (Section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason NOT to deliver affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

4.5 RPS does not dispute the fact that there is a considerable shortfall in affordable housing provision in the Borough. The latest 2017 SHMA indicates (paragraph 8.12) that to meet estimated affordable housing need (at the rate of 40%), around 1,300 dwellings per annum would be required. This is a significant amount that can only be met through planning for growth beyond the current Local Plan targets.

4.6 The current wording of the policy seeks to achieve a minimum of 40% affordable housing, suggesting that the rate sought may indeed be higher. The Council’s viability has appraised the affordable housing threshold of 40%, but has not tested any higher scenarios and as such, the Council is unjustified in seeking higher requirements.

4.7 RPS does not agree with the Council’s current evidence as part of this policy and would expect that this is given further consideration prior to submission, to ensure that the evidence is proportionate and takes into account local data.
surrounding including land values, construction costs and the implications of the Community Infrastructure Levy (CIL) charging schedule.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1165  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)  Agent: Vortal Properties Ltd (Robert Symons)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

On the whole Vortal Properties support the changes to Policy H2, specifically including;

- the removal of the wording in (3) ‘Developers will be expected to provide land for affordable homes at nil value,’ which should form part of the viability of the development
- the addition to allow Affordable housing contributions to be provided off-site, or by payment in lieu subject to agreement with the Council

Exceptions to changed wording include;

- Section (2) does not align with National Planning Policy and size of housing threshold to deliver affordable housing
- C2 housing should not be included within the requirement for delivery of affordable housing, due to the specialist nature of the dwelling usage. The wording for consideration on a ‘case-by-case’ basis is not definitive and should be removed altogether.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/236  Respondent: 17991873 / Guildford Borough Council (Economic Deve (Sir or Madam)  Agent: MADDOX (Matt Hill)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposed Policy H2: Affordable Homes

Proposed policy H2 sets out that the Council will work with registered providers, developers and landowners to increase the number of affordable homes in the borough to assist in meeting the identified needs. As a result of this, the Council is seeking the provision of at least 40 per cent of affordable homes on sites providing five or more homes, or where they are greater than 0.17ha. In addition, policy H2 sets out that affordable contributions may be provided off-site, or by payment in lieu where the Council agrees that on site provision and management would be impractical.

Within the subtext of proposed policy H2, reference is made to viability. The sub text outlines that in considering viability, there may be some circumstances where abnormal costs would make the scheme unviable to deliver. In such circumstances, developers will need to demonstrate that providing the amount of affordable housing required by the
policy would not be economically viable and as such, the Council may consider varying the tenure mix or reducing the overall number of affordable homes to assist in delivering the scheme.

The requirement to provide 40 per cent affordable homes on scheme of over 5 dwellings or 0.17ha in size, as sought through proposed policy H2, is supported in principle. However, although the subtext of policy H2 makes reference to the viability testing which we support, no specific reference is contained within the policy itself.

To ensure the policy fully complies with national planning policy and guidance, it is considered pertinent to provide direct reference to viability testing within the wording of policy H2 so that that 40 per cent of homes on qualifying sites will be sought for affordable housing, subject to the necessary viability testing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: pslp171/237  Respondent: 17991873 / Guildford Borough Council (Economic Deve (Sir or Madam))  Agent: MADDOX (Matt Hill)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

In summary, we support the preparation of the Local Plan and the principle of both policies H2 and A24 positively. However, we consider policy H2 (affordable housing) can be enhanced further in order to conform with national planning policy and guidance, assist forthcoming development in the borough and boost housing land supply.

Thank you for the opportunity to respond to the Local Plan Proposed Submission Consultation. We hope these comments are of assistance and would be grateful for confirmation that they have been considered as part of this consultation. We also confirm that we would like to be involved in the future stages of the Local Plan preparation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Total records: 570.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy H3 - Rural Exception Homes
### Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1790</th>
<th><strong>Respondent:</strong></th>
<th>8561377 / The Guildford Society (Julian Lyon)</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H3</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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<tr>
<td>ss) The Guildford Society has no objection to the amendments made to Policy H3.</td>
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<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/6171</th>
<th><strong>Respondent:</strong></th>
<th>8562273 / The Clandon Society (Christopher Dean)</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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<tr>
<td><strong>POLICY H3 – Rural Exception Homes</strong></td>
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<tr>
<td>We object to this policy for a number of reasons:</td>
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<tr>
<td>1. The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the Planning authority could be obliged to grant permission for inappropriate and unsuitable developments.</td>
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<td>1. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.</td>
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<tr>
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<td>1. The policy wording should be restricted to adjoining sites or define the concept of being &quot;closely related&quot;. In particular, we believe adding the concept of “safe and easy walking distance” extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance and school children are expected to walk further than that before being eligible for free school travel.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17425</th>
<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tr>
</tbody>
</table>

**H3 – Rural Exception Homes**

**WHPC view:** Supports

**In brief:** Only for sites adjoining or closely related to a defined rural settlement

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/17455</th>
<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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</tbody>
</table>

**Policy H3 Rural Exception Homes**

WHPC supports this policy but only for sites adjoining or closely related to a defined rural settlement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3169</th>
<th>Respondent: 8568193 / Miss Edwina Attwood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could...
be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

---

Comment ID: PSLPP16/2177  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H3 Rural Exception Homes This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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Comment ID: pslp171/2324  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

<table>
<thead>
<tr>
<th>H3 Rural Exception Homes</th>
<th>Objec...</th>
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<tbody>
<tr>
<td>I believe that affordable homes should retain this category for at least the length of the plan / as long as possible but appreciate that in perpetuity is a long time. They should however be affordable for as long as possible and hence this phrase should, in my view, remain.</td>
<td></td>
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<tr>
<td>the affordable homes are all secured as affordable homes in perpetuity.</td>
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</tbody>
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I do not agree with the categorization for rural exception housing. I agree that there should be provision for exceptional circumstances ie when a family member needs care and the carer is unable to afford housing, but I believe that the criteria needs more thought. My concern relates to the number of college courses that bear no resemblance to employment opportunities and the inevitable consequences. Equal opportunity should ensure that everyone has the chance to take a path in life where they can stand independently. Where this fails at a local level, I do believe that housing should be made available, but it should be, as its name suggests, an exception. I do not agree that people who have recently left the locale should be considered unless their reasons for leaving are linked to cost of housing and they fulfill the criteria otherwise set.

I also believe that Parish Councils should be able to write and carry out their own surveys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18720</th>
<th><strong>Respondent:</strong> 8581089 / Jenny Wicks</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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<td><strong>Policy H3</strong></td>
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<tr>
<td>I object to this policy because it should define ‘small’ to provide clarity.</td>
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<tr>
<th>Comment ID: PSLPP16/17550</th>
<th><strong>Respondent:</strong> 8581505 / Burpham Neighbourhood Forum (Jim Allen)</th>
<th><strong>Agent:</strong></th>
</tr>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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<tr>
<td><strong>This policy does not ‘explain’ why an exception exists. This must be defined to ensure this policy is sound.</strong></td>
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<tr>
<th>Comment ID: PSLPP16/12185</th>
<th><strong>Respondent:</strong> 8582017 / The Clandon Society (J Wright)</th>
<th><strong>Agent:</strong></th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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<td><strong>I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.</strong></td>
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The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related". Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13524  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There is no reference to Paragraphs 87 to 89 on pages 20 and 21 of the NPPF which should be included in this policy. It should also be made clear that rural exception homes are not a loophole for those on the Guildford Borough housing list through which to move into the countryside but are made available only to meet local need for people with a village connection that should be monitored and agreed by the Parish Councils concerned.

The Future

How can homes be built in Normandy to meet the needs of its population?

By retaining ‘washed over by the Greenbelt’ status, GBC has the opportunity to develop a plan which as the NPPF intends will promote diversity and protect our heritage assets. There is also the not so small issue of retaining farmland and rural community. I would hope that a policy can be drawn up by GBC to cover these points but also to provide details of appropriate density and building styles which will have the effect of promoting openness and this preserving the greenbelt

In the last plan period the Administrative area of Normandy was able to increase household numbers by 10% and there is no reason to think that this ‘windfall housing’ cannot be replicated in the upcoming plan period.

The Govt has changed the definition of ‘affordable housing’ and there are sites where a small amount of housing by way of flats for sale and rent could be provided both for the young people of Normandy but also the elderly who may wish to free up their family homes in their declining years for ground floor but smaller accommodation which they can manage. There is also a need for supported housing for our elderly. This could be provided under the rural exception scheme as we have before. It remains very important however that there is a limit on roof height and ample spacing (ie appropriate density) between homes. GBC have failed to implement a policy in this regard in recent years and the effect has been simply to spoil and change the nature of the area in some places.

I have not been able to read the whole plan because of my complaints above. I hope that I have provided useful information and comment. I will have to leave others to comment elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11184  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3 - Rural Exception Homes

I am in favour of Rural Exception Homes to provide homes for local people who cannot afford 'affordable' homes but not as a means for developers to sell commercially priced homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17505  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
POLICY H3 Rural Exception homes

There is no reference to Paragraphs 87 to 89 on pages 20 and 21 of the NPPF which we believe should be included in this policy. It should also be made clear that rural exception homes are not a loophole for those on the Guildford Borough housing list through which to move into the countryside but are made available only to meet local need for people with a village connection that should be monitored and agreed by the Parish Councils concerned.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
and price is immense. The Settlement Hierarchy document indicates that Chilworth has a shortage of three-bedroom accommodation, the impact of which is to break-up the local community. Similarly the nature of property in Shalford is such that young people who have grown up in the village are unlikely to be able to afford property in the area when they leave home. We would urge GBC to acknowledge the needs of local people as an integral part of any long-term plan for the borough.

7.3.3 Following our Shalford Housing Needs Survey (September 2012), we have worked with the Affordable Housing Team to identify potential rural exception sites in order to provide affordable housing specifically for those with genuine local connections. This simply emphasised the difficulty in finding areas acceptable for development, but the Parish Council is committed to following this project through to fruition and there may be some parcels of land (possibly owned by GBC), which we will wish to review with the Council.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/9836  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

| H3 | Rural Exception Homes | Support. |

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/464  **Respondent:** 8640353 / Julian Cranwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Policy H3: Rural exception homes**

**Response**

**Summary**

**I OBJECT**

This policy allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that
the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

**Detailed response:**

Re rural exception sites, the NPPF deals with this in NPPF 54 which states: "In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate". This clause makes it clear that housing in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.

The following extract from the National Planning Policy Guidance is relevant:

**Paragraph: 034 Reference ID: 3-034-20140306**

*Can unmet need for housing outweigh Green Belt Protection?*

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Revision date: 06 03 2014

In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt.

It uses existing and projected affordable housing within the villages not in order to meet local needs but as a response to the general housing list. This, per the NPPF, is inappropriate. It is symptomatic of the manner in which Guildford Borough treats the rural area – although containing 50% of the population of the borough – as merely ancillary to the needs and desires of the town.

This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.

The other, which should not be overlooked, is that it has the capacity to create a rural poverty trap. In Gomshall, for example, (the site of a significant number of new affordable homes currently being built by GBC) the cost of a single bus fare to Guildford is currently £3.50 and the cost of a single train fare to Guildford is £3.80. This is likely to prove a significant obstacle in seeking employment or the facilities needed by most members of a community (cheaper food from supermarkets; hospitals; dentists; secondary schools; junior schools (none of these are present in Gomshall)). Such a rural poverty trap is likely to be of less impact for those with family in the immediate area or those who work in the area; but for those on the general housing list it is inappropriate housing. So if the affordable housing within villages is allocated to those with local connections, the need for the rural exception scheme falls away. It should be noted that the NPPF requires the policies under which limited affordable housing for local need to be set out in the Local Plan; this should not set out the circumstances either of where these policies should apply, nor to whom they should apply – both would seem to be required.

One particularly shocking – developer led – initiative is the proposal which suggests that the rural exceptions scheme should be utilised to grant planning permission in the Green Belt OUTSIDE settlement boundaries for market housing. This is completely in contravention of NPPF.

The detail of this provision indicates that this will override all guidelines as to appropriate zones for development within the plan. It is wholly unacceptable.
NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are... limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme.

Concerns have been expressed previously that the ordinary rural exceptions scheme could become a “Trojan Horse” policy allowing development that should not otherwise be permissible. This expression of that policy emphatically seems to embrace this concept.

This policy is much wider than the NPPF requirement that rural exception sites should be restricted to the local (i.e. parish level) need. The wording of this policy- “contribute to meeting.. local needs” means that GBC plans to use these to meet its normal housing list - the “local” is defined by GBC as meaning “current or former residents of the borough or have a family or employment connection“. So these would not really be local housing at all.

This policy requires radical revision in order to articulate the requirements under which the rural exception scheme might be permissible, making it clear that

- it will not be permitted except where there is demonstrable unfilled local need which cannot be met elsewhere?
- make it clear what the requirements are to qualify for the scheme?
- ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of rural exception sites will only apply in exceptional circumstances.

Under no circumstances should the rural exceptions scheme be used to accept market housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10071  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to this policy which allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

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**Revision date: 06 03 2014**

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This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.

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Under no circumstances should the rural exceptions scheme be used to accept market housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8643393 / Sue Baker</th>
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I also object to GBC’s use of the term “affordable” housing. As I understand it, their definition of “affordable” is that the property should be 20% below market value. However, this is in reality a nonsense. This is because developers will want to maximise their profits by building big houses. If a house has a market value of £800,000 the “affordable” price for that house would be £640,000. Surely it is ridiculous to call this “affordable” for the target market of young professionals and families as this level would be out of reach to most of them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Agent:</th>
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</table>

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/13  **Respondent:** 8655233 / Kay Mackay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )**

If residents come first then much of what is proposed would be scrapped. And the biggest issue facing these proposals is safety. We have 2nd class roads that are A roads which are totally unsafe. This can not be legally compliant and is unsound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The "right" to live in a village because your parents do has never been an affordable option. Social housing in villages that is now privately owned has become "unaffordable" All this policy does is to provide subsidised housing to a few who can then maximise the profit a few years later. It has been more than 50 years since people lived in the same streets as their relatives. The world has moved on with university education and the car. There is no return to some nostalgic idyll of cosy country life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

17. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The bluebox policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 8789) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a selfperpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be
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The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The bluebox policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1372  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

H3 Rural Exception Homes

I object to this, the most frightening policy proposed by GBC, as it will encourage development on AONB land and Agricultural Land as has recently been proposed by a developer on a site, not included in the Draft Local Plan, at the junction of the A246 and Shere Road in West Horsley, with access onto an already overcrowded roundabout.

The original intention of these developments was to allow people in a village to downsize, or for their children to remain in the village, but GBC intend to allow anyone on the Guildford housing list to take advantage of this building.

The NPPF (paras 87-89) must be applied when demonstrating "exceptional circumstances".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2304  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The original intention of these developments was to allow people in a village to downsize, or for their children to remain in the village, but GBC intend to allow anyone on the Guildford housing list to take advantage of this building.
The NPPF (paras 87-89) must be applied when demonstrating "exceptional circumstances".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1540  Respondent: 8687041 / Michael Aaronson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I OBJECT, because this is simply a licence to build on the Green Belt. It is a Policy so weak in the way it is framed that it is open to all manner of exploitation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1068  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3 – Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means large executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2620  Respondent: 8693153 / Vicki Willetts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES): • It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF
“exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8885  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

West Horsley, unlike East Horsley, can still benefit from the policy relating to Rural Exception Homes, this allows small affordable housing development in perpetuity. No sites were noted as allocated to this programme within the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4510  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.
The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

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The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

It implies that homes can be built anywhere near a settlement of any form (including agricultural land, Green Belt and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list and they are not in perpetuity because of right to buy.

The blue-box policy wording needs to limit rural exception to cases of demonstrable, unfilled, local need that cannot
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Attached documents:

Comment ID: PSLPP16/3509  Respondent: 8726529 / Eric Palmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3 – Rural Exception Homes

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Attached documents:

Comment ID: PSLPP16/16904  Respondent: 8728865 / Neville Bryan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Strongly Object

This policy will be a disaster for Guildford residents. This wording looks like a developer’s charter. A local community nightmare, which appears to allow development outside the settlement boundaries - even in Green Belt. This policy introduces a loop hole to allow housing be built anywhere with no restriction, other than an obscure link to the easy to manipulate housing list.

Wording needs to make clear, as part of the policy that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6712  Respondent: 8731649 / Ian Slater  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/13938  Respondent: 8732993 / Michael Weber  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/15832  Respondent: 8732993 / Michael Weber  Agent: 

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Attached documents:

Comment ID: PSLPP16/12969  Respondent: 8735873 / David and Gillian Allan  Agent:

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Attached documents:

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**Comment ID:** PSLPP16/3926  **Respondent:** 8744161 / Michael Bridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**Comment ID:** PSLPP16/3947  **Respondent:** 8744257 / Mary E Bridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**Comment ID:** PSLPP16/9352  **Respondent:** 8744417 / Mark & Gillie Hammersley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**Comment ID:** pslp171/2003  
**Respondent:** N J Norton  
**Agent:** 8748801

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3 Blue Policy Box

I object to the insertion of the word "affordable" in all locations in the blue policy box. Planning guidance defines "affordable" as 80% of local rental levels or 80% of average house price. The latest South West Surrey SHMA for the Guildford housing market sets the average house price at approx £465,000 of which 80% is approx £365,000; this is not "affordable" to those essential service workers such as nurses, local authority employees, public transport employees, fire service employees. This will simply provide further opportunity to private housebuilders to flood local villages with more market homes under the guise of being "affordable".

I propose the removal of all references to "affordable" in the Policy H3 blue policy box.

Para 4.2.49

I object to the phrase "This includes a cascade approach to the allocation of rural exception housing." being removed from paragraph 4.2.49, page 49 as it links to provisions in the removed paragraph 4.2.54.

I propose the phrase "This includes a cascade approach to the allocation of rural exception housing." is reinstated in paragraph 4.2.49, page 49.

Para 4.2.54

I object to the removal of paragraph 4.2.54, page 49 as follows:

"To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme)."

It is essential that housing delivered by Policy H3 is for those identified with loca connections. We have already suffered from the council pushing those from the general housing list into housing association properties built in Normandy under the auspices of being for those identified in a local housing needs survey.

I propose the re-instatement of paragraph 4.2.54, page 49 as follows:

"To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme)."

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The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5076  Respondent: 8770177 / Phil Attwood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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Attached documents:

Comment ID: PSLPP16/4900  Respondent: 8771233 / Ranald Mackinnon  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6409  Respondent: 8773953 / Robin Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this policy as worded. The vague wording does not clearly define the limits of any new housing developments within or around existing rural communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17035  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/3293  **Respondent:** 8792193 / Brian Wolfe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY H3: Rural exception homes**

- The policy states small affordable housing developments, including pitches for travellers, will be permitted to meet identified local affordable housing needs provided that:
  - (a) the site adjoins or is closely related to, and in safe and easy reasonable walking distance of a defined or a non-defined rural settlement, and
  - (b) the number, size and tenure of homes would be appropriate to meet, or to contribute to meeting, the identified local affordable housing needs of the local community, and
  - (c) The affordable homes are all secured as affordable homes in perpetuity

**GBC justification statement**

- States that there are fewer opportunities to build new homes in our small rural settlements surrounded by, or designated as Green Belt than there are in and around the towns of Guildford, and Ash and Tongham due to more restrictive policies on housing in countryside and particularly in the Green Belt. Reflecting this reduced opportunity, legislation enables us to secure affordable housing in perpetuity in and around most of the villages in the borough. In the villages and parishes listed in the legislation we can secure rural exception housing in perpetuity, secured by planning obligation. In the parishes of East Horsley and Send, rural exception housing may be delivered providing the protection is in place to secure these permanently as affordable housing.
I object to the wording of the Policy H3 and the wording of GBC justification statement 4.2.47 as they are not only confusing but are factually incorrect.

Justification

• In GBC justification it makes reference to legislation that enables GBC to secure housing in perpetuity as affordable. The legislation referred to I suspect is the statutory instrument The Order Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 No 2098. Under schedule 11 part 7 is a list of villages in Surrey where the whole village is protected from the right to enfranchise. Under schedule 12 part 7 it shows those villages in Surrey that are only partly protected and the areas protected are identified on a map. The protection status are also used to identify village where the right to buy is also not permitted.
• As correctly stated East Horsley is not protected from the right to buy or right to enfranchise. However GBC have failed to notice that a major part of West Horsley (north) is also not protected and is listed under schedule 12 part 7. This legislation does not relate to rural exception housing.
• There appears some lack of clarity and/or understanding over “protected areas” and “rural exception housing” they are not the same and both cover different issues. For example any social housing built in protected areas (villages) is protected from the right to buy or enfranchise and can be retained in perpetuity as such, it is not “Rural exception housing.”
• “Rural exception housing” is a definition given to a special form of affordable housing that can be provided in small rural communities and on land that would not normally be considered for housing it is often outside a village settlement on the green belt. Housing built can be protected in perpetuity and not lost to the market. They are also designed specifically for local people or somebody who works in the village.
• This means however that all social housing built in East Horsley and West Horsley (north) would be subject to such the right to buy or enfranchise. It cannot be protected in perpetuity by and planning directive. If however, housing were to be built outside the village settlement boundary and as “rural exception housing” it would then be possible for it to be protected in perpetuity by a planning directive.
• The concern here in East Horsley is that any new affordable housing could rapidly be lost to the market. With East Horsley being the least popular area in the borough for tenants of social housing and has the lowest level of applicants. An in lieu contribution from a developer would be better payback in the long term.
• The wording in GBC Policy is not correct and needs to be thought through more carefully. This also has a link to their Policy P2 which is bent on expanding the village settlement boundary.
• The final sentence in 4.2.47 is also wrong. Rural exception housing cannot be delivered in East Horsley it can only be provided if the site is outside the parish boundary. Then and only then would it be protected in perpetuity.
• Two current affordable housing sites in East Horsley at Chown Court and Frenchlands Gate are rural exception development. They are both outside the settlement boundary. I am not sure of their status if the settlement boundary is moved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16507  Respondent: 8794753 / Andrew Beckett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to
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Comment ID: PSLPP16/94  Respondent: 8797537 / Shonagh Finnan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the shear number of extra houses proposed for Horsley, West Horsley in particular. I think a little in-filling might be acceptable IF the need for extra houses has been shown now, which it has not been in the near past. The character of the village will change. The additional percentage increase is totally unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7595  Respondent: 8798849 / David Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
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Attached documents:

Comment ID: PSLPP16/2336  Respondent: 8806849 / Roland McKinney  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

I object to this policy.

It is a Trojan Horse policy. It will lead to more housing under the guise of being for local people.

Not only that, but the legality of being able to say that houses must be kept in perpetuity for local people is questionable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5285  Respondent: 8810113 / Louise Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H3

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Attached documents:

Comment ID: PSLPP16/16546  Respondent: 8810849 / Charles Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3 – Rural Exception Homes

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Comment ID:** PSLPP16/16451  **Respondent:** 8818625 / Beth and Frank Fuller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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Attached documents:

Comment ID: PSLPP16/13264  Respondent: 8820353 / Gillian Beaton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/5577  Respondent: 8826081 / Simon Wilcockson  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
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Comment ID: PSLPP16/13404  Respondent: 8826369 / Tim Madge  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
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Affordable housing should be built in those areas close to employment, transport hubs and existing shopping and entertainment facilities. Thus limiting the impact on existing infrastructures and the environment.

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**Comment ID:** PSLPP16/6144  **Respondent:** 8830145 / Peter Smart  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy H3**

I OBJECT to Rural Exception Homes that would be allowed to be permitted where the site adjoins or is closely related to a defined or a non-defined rural settlement on the grounds that this gives permission for development of these types of buildings in any area near existing dwellings. The wording of the policy is far too wide and as drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16608  **Respondent:** 8835873 / Effingham Residents' Association (Vivien White)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Housing Policies**

We support the mix of housing proposed in the Local Plan and in particular the provision of one and two bedroom properties which are needed in Effingham and across the borough. We are however concerned by Policy H3 which we think could be used to remove a continuous amount of land from the Green Belt in “small affordable housing developments.” This policy needs to be better defined to limit the numbers of houses in such developments and to control the number of such developments in any locality by requiring evidence for the need, taking into account other developments in that locality in the preceding ten years.

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**Comment ID:** PSLPP16/7124  **Respondent:** 8837313 / Maria Baker  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY H3 - Rural Exception Homes

I OBJECT to this policy as a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16926  Respondent: 8837729 / Harry Clarke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Policy H3 – object
   1. The policy does not define or provide an upper limit on “small affordable housing developments”. As worded the policy could be used to continually remove houses from the Green Belt. For example, this could permit 10 houses to be built per year in a village, if submitted as multiple planning applications.
   2. The policy must state what is meant by “small developments” (e.g. five houses), and also must state account must be made of other developments within the area (or plans), within the last ten years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16214  Respondent: 8839041 / Jon Maslin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H3 Rural Exception Homes

This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the 'mix', this can include 'market' housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove ‘exceptional circumstances.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. This alone makes the overall policy ineffective and capable of challenge.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13181  
Respondent: 8840449 / David Wilson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3: Rural exception homes

5.1. I OBJECT to Rural Exception homes overriding Green Belt rules.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18178  
Respondent: 8843361 / Adrian Atkinson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1933  
Respondent: 8848033 / Paul Gerrard  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

“Small affordable housing developments, including pitches for travellers…”

Objection. Surely this is contrary to Policy E in the NPPF Planning Policy for Travellers document that states traveller sites are inappropriate development in the Green Belt, except in very special circumstances. What are the very special circumstances here?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
4.2.52 “We may also consider allowing at least one market home where this would result in a significant improvement in
the housing mix (tenure, type or size) or rent levels.”

I object. Justification on grounds of housing mix surely exceeds the NPPF definition of rural exception. What "essential"
need justifies this particular exception?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/10619  Respondent: 8855969 / Jonathan Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/17772  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this policy which allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

Re rural exception sites, the NPPF deals with this in NPPF 54 which states:?”In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate”.?This clause makes it clear that housing
in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.

The following extract from the National Planning Policy Guidance is relevant:

Paragraph: 034 Reference ID: 3-034-20140306

Can unmet need for housing outweigh Green Belt Protection?

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Revision date: 06 03 2014

In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt.

It uses existing and projected affordable housing within the villages not in order to meet local needs but as a response to the general housing list,. This, per the NPPF, is inappropriate. It is symptomatic of the manner in which Guildford Borough treats the rural area – although containing 50% of the population of the borough- as merely ancillary to the needs and desires of the town.

This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need.?Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.?The other, which should not be overlooked, is that it has the capacity to create a rural poverty trap. In Gomshall, for example, (the site of a significant number of new affordable homes currently being built by GBC) the cost of a single bus fare to Guildford is currently £3.50 and the cost of a single train fare to Guildford is £3.80. This is likely to prove a significant obstacle in seeking employment or the facilities needed by most members of a community (cheaper food from supermarkets; hospitals; dentists; secondary schools; junior schools (none of these are present in Gomshall)). Such a rural poverty trap is likely to be of less impact for those with family in the immediate area or those who work in the area; but for those on the general housing list it is inappropriate housing.?So if the affordable housing within villages is allocated to those with local connections, the need for the rural exception scheme falls away.?It should be noted that the NPPF requires the policies under which limited affordable housing for local need to be set out in the Local Plan; this should not set out the circumstances either of where these policies should apply, nor to whom they should apply – both would seem to be required.

One particularly shocking – developer led –initiative is the proposal which suggests that the rural exceptions scheme should be utilised to grant planning permission in the Green Belt OUTSIDE settlement boundaries for market housing. This is completely in contravention of NPPF.

The detail of this provision indicates that this will override all guidelines as to appropriate zones for development within the plan. It is wholly unacceptable.

NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:.. limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme.?

Concerns have been expressed previously that the ordinary rural exceptions scheme could become a “Trojan Horse” policy allowing development that should not otherwise be permissible. This expression of that policy emphatically seems to embrace this concept.
This policy is much wider than the NPPF requirement that rural exception sites should be restricted to the local (i.e. parish level) need. The wording of this policy - “contribute to meeting... local needs” means that GBC plans to use these to meet its normal housing list - the “local” is defined by GBC as meaning “current or former residents of the borough or have a family or employment connection”. So these would not really be local housing at all.

This policy requires radical revision in order to articulate the requirements under which the rural exception scheme might be permissible, making it clear that

- it will not be permitted except where there is demonstrable unfilled local need which cannot be met elsewhere?
- make it clear what the requirements are to qualify for the scheme?
- ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of rural exception sites will only apply in exceptional circumstances.

Under no circumstances should the rural exceptions scheme be used to accept market housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8858113 / Ramsey Nagaty</th>
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9 POLICY H3 RURAL EXCEPTION HOMES
9.1 I object to the change in policy H3 Rural Exception Homes.

9.2 I object to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).”

9.3 This demonstrates GBC’s disregard for local housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/2418</th>
<th>Respondent: 8858433 / Eric Peters</th>
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Policy H3 - Rural Exemption Homes

I object. Need to limit rural exception to demonstrable local need that can’t be met elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy H3 – Rural Exception Homes which will be allowed to be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. The policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) still applies to these cases, including the need to prove “exceptional circumstances.” The wording of the policy is far too wide and makes a mockery of all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for all developments however inappropriate and unsuitable. The wording prevents balancing the desirability of the development against other considerations including harm to the Green Belt or the AONB. The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should define “small” and should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist. The wording of the policy should also be changed to require the local connection requirement for tenants to be secured in perpetuity.

The policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2210  Respondent: 8860897 / Julia Shaw  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I OBJECT

This policy allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14852  Respondent: 8865985 / Grant Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to this policy. It is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8875233 / Richard Hiam</th>
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1. POLICY H3 – Rural Exception Homes

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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7657</th>
<th>Respondent: 8875457 / Mark Ground</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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19. POLICY H3 - Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
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Attached documents:

Comment ID: PSLPP16/7166  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11604  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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I OBJECT To Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8467  Respondent: 8893057 / Dianne Garnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3  Rural exception Homes

I Object to this as it potentially allows for development in the Greenbelt. it should be made CLEAR that this would only be allowed in exceptional circumstances especially in relation to NPPF 87, 88, and 89. It appears that the Guildford Borough Council is using existing projected needs for housing instead of local needs in their numbers. There has been a developer led proposal that rural exceptions should be used to gain permission to build outside settlement boundaries, in complete contravention of NPPF. This scheme should be strictly controlled and should not be used for market housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16964  Respondent: 8893057 / Dianne Garnett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 We object to policy H3 Rural Exception Homes

1.2 This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

1.3 The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1780  
Respondent: 8893057 / Dianne Garnett  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that paragraphs have been deleted. If Developers are not monitored for efficient use of space and a policy for minimum and max. densities must be in place or there will be additional pressure on undeveloped land and the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1538  
Respondent: 8894657 / Jacob’s Well Residents’ Association (Janet Smith)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The JWRA strongly object to the removal of section 4.2.54 and its caveats regarding priority to be given to new homeowners/occupiers having local links to the relevant area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12162  
Respondent: 8896097 / Andrew Fordham  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

17. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related".

In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

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**Attached documents:**

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**Comment ID:** PSLPP16/8150  **Respondent:** 8902465 / Linda Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF

2

“exceptional circumstances” and other restrictions to build large houses in the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/18534  **Respondent:** 8903265 / Susan Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18446  Respondent: 8909761 / Diana Grover  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
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The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Under existing law, an unfulfilled housing need is not an exceptional circumstance. Conversely, the existence of the Green Belt/Area of Outstanding Natural Beauty is a legitimate legal reason for not meeting objectively assessed housing need. The draft Plan fails to demonstrate substantive evidence that other development options have been thoroughly investigated and found to be untenable and therefore I object to any proposal to remove greenbelt designation from East and West Horsley.

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<th>Comment ID: PSLPP16/13257</th>
<th>Respondent: 8919009 / Andrew Kukielka</th>
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<th>Comment ID: PSLPP16/3523</th>
<th>Respondent: 8919521 / Susan Hughes</th>
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POLICY H3 – Rural Exception Homes

OBJECT. Any policy that allows homes to be built anywhere near a settlement and ignores all historic planning restrictions is to be resisted. Again, new residents could come from any part of Guildford borough and so there would not be an automatic benefit to the local people who would be losing protected land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11996  Respondent: 8921377 / Paul Maycox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Attached documents:

Comment ID: PSLPP16/13255  Respondent: 8921857 / Claire Kukielka  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attacked documents:

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**Comment ID:** PSLPP16/5793  **Respondent:** 8924577 / Charles Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Rural Exception Homes

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attacked documents:

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**Comment ID:** PSLPP16/15136  **Respondent:** 8926529 / Annie Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3 - Rural Exception Homes

I am in favour of Rural Exception Homes to provide homes for local people who cannot afford 'affordable' homes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attacked documents:

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**Comment ID:** PSLPP16/11719  **Respondent:** 8928033 / P. Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/60  Respondent: 8929057 / East Horsley Parish Council (Nick Clemens)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3: Rural exception homes

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4466  Respondent: 8930209 / Ray Corstin  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I am not objecting to this policy. However, I am uneasy about the fairness of this policy in relation to eg protecting the Green Belt and giving special treatment to certain people. After all, many people could (and do) travel to work and to visit family connections and friends. Many people do not live near their work or family connections or friends and they accept this situation as part of normal life.

There should be a small number of such homes. There is no need to build them between Ash and Guildford as it is not a remote area (eg suitable homes are in Aldershot, Tongham, Ash, Guildford).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/827

Respondent: 8933537 / Annie Ladd

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

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Attached documents:

Comment ID: PSLPP16/16037  Respondent: 8941761 / FLGCA (Paul Kassell)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We understand the definition of rural exception homes in the NPPF as a way of providing homes for people engaged in agriculture in particular for a local rural community. “Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.” There is no protection within this policy to ensure that tie to the local rural community; instead it seems to be a way of providing general affordable homes. Without this tie, we must object to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2725  Respondent: 8944929 / A Jefferies  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

9. I object to policy H3 para b “the local community”. Rural exception sites should only be allowed where the identified need is truly local defined as within the parish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9366  Respondent: 8948385 / Gillian Eve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Policy H3: Rural Exception Homes

I OBJECT. This policy allows potential development outside settlements even in Green Belt and includes wording to propose extension of this policy for market housing. The policy wording should explicitly limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16153  Respondent: 8948385 / Gillian Eve  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy allows potential development outside settlements even in Green Belt and includes wording to propose extension of this policy for market housing. The policy wording should explicitly limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2505  Respondent: 8948385 / Gillian Eve  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3: Rural Exception Homes

I OBJECT to the changes, which do not go far enough to ensure that rural exception is limited to cases of demonstrable, unfilled, local need that cannot otherwise be met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17370  Respondent: 8971137 / Woolf Bond Planning (Thomas Rumble)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Paragraph 54 of the NPPF refers to rural exception sites as follows:

'In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable
housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs'.

The final sentence of the above quotation refers to the potential for some market housing to be allowed to facilitate affordable housing delivery. This is also referred to in the Plan itself at paragraph 4.2.52. We therefore propose that the following additional bullet point is added to Policy H3:

'market housing will be allowed where it has been proved that it is necessary to make the affordable housing provision viable'

The above wording would enable Policy H3 to be more consistent with national policy in accordance with the NPPF tests of soundness.

Proposed Change:

The addition of the wording suggested above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7315  Respondent: 8971233 / Tim J. Harrold  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3 Rural Exception homes

There is no reference to Paragraphs 87 to 89 on pages 20 and 21 of the NPPF which we believe should be included in this policy. It should also be made clear that rural exception homes are not a loophole for those on the Guildford Borough housing list through which to move into the countryside but are made available only to meet local need for people with a village connection that should be monitored and agreed by the Parish Councils concerned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13116  Respondent: 8993121 / Shelagh Yeomans  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3: Rural exception homes

I OBJECT to this policy
This policy allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8668</th>
<th>Respondent: 9050337 / Nigel Geary</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I support this policy.</td>
</tr>
</tbody>
</table>

**POLICY H3 – Rural Exception Homes**

OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (this includes agricultural land and the AONB). These homes could be homes for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (ie normal commercial development). This policy means building anywhere, and ignoring all historic planning restrictions.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/11427</th>
<th>Respondent: 9062913 / Susan Parker</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to the change in policy H3 Rural Exception Homes. I object to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to</td>
</tr>
</tbody>
</table>
adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Home choice (or equivalent scheme).”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies,
including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/4490</th>
<th>Respondent: 9298465 / Peter Grover</th>
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<tr>
<td>1. POLICY H3</td>
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I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfulfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8083  Respondent: 9298689 / Rod Wild  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3 - Rural Exception Homes

OBJECT. This seems to allow building anywhere, regardless of restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14941  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (this includes agricultural land and the AONB). These homes could be homes for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development). This policy means building anywhere, and ignoring all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10634  Respondent: 9335041 / David Reeve  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3: Rural Exception Homes

I OBJECT that this policy is an attempt to address the affordability problem in the wrong way. As stated under the objection to Policy H2 above, there is no point in attempting to apply supply side solutions in a situation where demand is essentially unlimited. While I have great sympathy for families struggling to find a home (either rented or purchased) at a
price they can afford, it is an illusion that policies such as this will solve the problem. If the Council really wants to address the issues identified in Policies H2 and H3, it should turn its attentions to lobbying central government, because no affordable interventions that it might seek locally will have any appreciable impact on the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5872  Respondent: 9412065 / Stephen Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

H3 - Rural exception homes:

On the same premises, I wholly support this policy which seeks to secure affordable homes in West Horsley for young people and the older generation alike, in perpetuity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6452  Respondent: 9607905 / Anne Pascoe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H3-Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10572  Respondent: 10299041 / F McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8216  Respondent: 10662849 / Garry Walton  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**POLICY H3 – Rural Exception Homes**

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/4556</th>
<th>Respondent: 10667073 / Trudi Harris</th>
<th>Agent:</th>
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I OBJECT this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/5936</th>
<th>Respondent: 10672417 / Matthew Kalupka</th>
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1. POLICY H3 - Rural Exception Homes

I object. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1502  Respondent: 10717985 / Alison Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to GBC's lack of clarity in this policy. A clear definition of rural exception is not provided. It is written: 'the number, size and tenure of homes would be appropriate to meet, or to contribute to meeting, the identified local affordable housing needs, and the homes are all secured as affordable homes in perpetuity'. This is meaningless.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17917  Respondent: 10722049 / Richard Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to this Trojan horse policy. (Policy H3 – Rural Exception Homes)

It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14792  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY H3 – Rural Exception Homes

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5021  Respondent: 10758593 / Richard & Delia Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12267  Respondent: 10765249 / Andy & Sonja Freebody  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13619  Respondent:  10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/10254  **Respondent:** 10780929 / Naren Nanda  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: PSLPP16/9137  Respondent: 10785633 / Penelope Eagle  Agent:

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Comment ID: PSLPP16/17523   Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)   Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to this policy which allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

Re rural exception sites, the NPPF deals with this in NPPF 54 which states: “In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate”. This clause makes it clear that housing in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.

The following extract from the National Planning Policy Guidance is relevant:

Paragraph: 034 Reference ID: 3-034-20140306

Can unmet need for housing outweigh Green Belt Protection?

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Revision date: 06 03 2014

In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt.

It uses existing and projected affordable housing within the villages not in order to meet local needs but as a response to the general housing list,. This, per the NPPF, is inappropriate. It is symptomatic of the manner in which Guildford Borough treats the rural area – although containing 50% of the population of the borough- as merely ancillary to the needs and desires of the town.
This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.

The other, which should not be overlooked, is that it has the capacity to create a rural poverty trap. In Gomshall, for example, (the site of a significant number of new affordable homes currently being built by GBC) the cost of a single bus fare to Guildford is currently £3.50 and the cost of a single train fare to Guildford is £3.80. This is likely to prove a significant obstacle in seeking employment or the facilities needed by most members of a community (cheaper food from supermarkets; hospitals; dentists; secondary schools; junior schools (none of these are present in Gomshall)). Such a rural poverty trap is likely to be of less impact for those with family in the immediate area or those who work in the area; but for those on the general housing list it is inappropriate housing. So if the affordable housing within villages is allocated to those with local connections, the need for the rural exception scheme falls away. It should be noted that the NPPF requires the policies under which limited affordable housing for local need to be set out in the Local Plan; this should not set out the circumstances either of where these policies should apply, nor to whom they should apply – both would seem to be required.

One particularly shocking – developer led – initiative is the proposal which suggests that the rural exceptions scheme should be utilised to grant planning permission in the Green Belt OUTSIDE settlement boundaries for market housing. This is completely in contravention of NPPF.

The detail of this provision indicates that this will override all guidelines as to appropriate zones for development within the plan. It is wholly unacceptable.

NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are... limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme. Concerns have been expressed previously that the ordinary rural exceptions scheme could become a “Trojan Horse” policy allowing development that should not otherwise be permissible. This expression of that policy emphatically seems to embrace this concept.

This policy is much wider than the NPPF requirement that rural exception sites should be restricted to the local (i.e. parish level) need. The wording of this policy - “contribute to meeting... local needs” means that GBC plans to use these to meet its normal housing list - the “local” is defined by GBC as meaning “current or former residents of the borough or have a family or employment connection”. So these would not really be local housing at all.

This policy requires radical revision in order to articulate the requirements under which the rural exception scheme might be permissible, making it clear that

- it will not be permitted except where there is demonstrable unfilled local need which cannot be met elsewhere?
- make it clear what the requirements are to qualify for the scheme?
- ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of rural exception sites will only apply in exceptional circumstances.

Under no circumstances should the rural exceptions scheme be used to accept market housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/817  Respondent: 10804961 / M. Basson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (this includes agricultural land and the AONB). These homes could be homes for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development). This policy means building anywhere, and ignoring all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11063  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H3

I OBJECT to Policy H3 - Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are
expected to walk further than that before being eligible for free school travel. The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity.

(For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12264  Respondent: 10816993 / Jane Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H3 – Rural Exception Homes as this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. This alone makes the overall policy ineffective and capable of challenge.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

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The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6628  Respondent: 10829121 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY H3 – Rural Exception Homes

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3929  Respondent: 10833537 / AC Vause  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances ."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to policy H3 “Rural Exception Homes” on the grounds that;

2. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

3. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the change in policy H3 Rural Exception Homes.

2. I object to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).”
1.3 This demonstrates GBC’s disregard for local housing need.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/7186  **Respondent:** 10854113 / Sarah Pickering  **Agent:**

<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</th>
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**Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

WE OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford Borough Housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14654  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8869  **Respondent:** 10857889 / William Kyte OBE  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3: Rural exception homes

**I OBJECT** to this policy

This policy allows potential development outside settlements even in the Green Belt and includes wording to propose extension of this policy for market housing. This policy seeks to introduce a scheme where housing could be built anywhere, with no restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1720  **Respondent:** 10857889 / William Kyte OBE  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The changes weaken the permanence of affordable homes in rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18590  **Respondent:** 10858977 / Angela Otterson  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I object** to policy H3 Rural Exception Homes

This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for
anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1946  Respondent: 10859489 / Jennifer Procter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3 RURAL EXCEPTION HOMES

1.1 I object to the change in policy H3 Rural Exception Homes.

1.2 I object to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).”

1.3 This demonstrates GBC’s disregard for local housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16011  Respondent: 10859553 / MARK Curtis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7208  Respondent: 10915361 / Judy Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3 – Rural Exception Home
I OBJECT to this policy which could be exploited for unintended development. The exceptional circumstances need to be more tightly defined

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14767  Respondent: 10920129 / Steven Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Rural Exception Homes OBJECT. I object to this policy as it allows homes to be built anywhere near a settlement and ignores all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11314  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9043  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

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Comment ID: PSLPP16/1676  Respondent: 10933857 / C J Tilbury  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/15361  Respondent: 10935201 / Cathryn Walton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/15831  Respondent: 10953249 / Charlotte Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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POLICY H3

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Attached documents:

Comment ID: PSLPP16/4996  Respondent: 10986689 / Richard Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Attached documents:

Comment ID: PSLPP16/15611  Respondent: 10987905 / Marika Chandler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/8340  Respondent: 10990145 / Anne Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/14636  **Respondent:** 10992225 / Emma Ringshaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/7444  **Respondent:** 10992833 / Amanda Verny White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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<th>Agent:</th>
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Attached documents:

Comment ID: PSLPP16/11199  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/15984  Respondent: 11004161 / NFU South East Region (Tom Ormesher)  Agent: 

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POLICY H3: Rural exception homes

In our reading Policy H3 does not meet the requirements of NPPF 55 as it restricts the development of rural exception homes to “Small affordable housing developments”.

As you are aware NPPF (page 50 Annex 2) provides a definition of Affordable Housing, which for the purposes of clarity is quoted as:

“Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.”

In nearly every case, the applicant and owner of a rural workers’ dwelling would be a commercial farm business. It would be unlikely and indeed undesirable for a farm business to be considered eligible to be a registered provider of social housing (i.e. as defined in s112 of the Housing and Regeneration Act 2008) and as such any application for a rural exception site is likely to fail if it involves a private commercial farm business.

This precludes the use of Policy H3 within a commercial farming context.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15347  **Respondent:** 11007393 / James Culmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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### Comment ID: PSLPP16/3974  
**Respondent:** 11008225 / Russell Pascoe  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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### Comment ID: PSLPP16/7597  
**Respondent:** 11010401 / J M Bates  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**Attached documents:**
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The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11688  Respondent: 11024257 / Jenny Richardson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17806  Respondent: 11033921 / Tim Depledge  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Rural Exception Homes - I object - providing affordable housing under whatever contrived definition is no reason to override the National Planning Framework's definition of exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14111  Respondent: 11036289 / Osman Abdullah  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H3 Rural Exception Homes  This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people
with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy H3 Rural Exception Homes

I object to the change in Policy H3 Rural Exception Homes.

I object to the deletion of paragraph 4.2.51 "to ensure that housing is secured permanently to meet local affordable housing needs…in accordance with its published scheme Guildford Home Choice(or equivalent scheme)"

This sadly shows GBC’s disregard for local housing need.

Any such policy should be subject to the NPPF constraints for development, particularly related to guidance on unmet housing need.

In conclusion, in view of all of the above, I would ask the Council to reexamine its position regarding the local plan 2017 and to think more deeply about the interests of the borough residents rather than about developers’ ‘pockets.’ I would like all the 32,000 previous objections to be properly addressed. I object strongly to the draft local plan 2017 as it has been presented. Policies conflict and evidence is not trustworthy. The SHMA should be disregarded, as argued in Policy A35 above. I am sad to say the promises of the Council to protect Green Belt in the borough are not in any way born out within Policies through the plan.

The Forward of the local plan 2017 says they will look after special landscapes and adopt a brownfield first strategy, but in the next breath say “in total 1.5% of Green Belt land will be removed and allocated for development.” As already shown above, this figure does not include all insetting of villages in Green Belt, so this is a sham, a pretence to local people that they are preserving Green Belt. It is deceitful.

It has been spelt out by national policy that “unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green Belt “. GBC has a responsibility to preserve all Green Belt in the borough even the actual 7% it intends to develop (as evidenced in the plan), because this land, Metropolitan Green Belt, represents a national and local asset to be safeguarded in perpetuity. GBC would be able under NPPF guidelines, to more sensibly reduce the housing target as already argued above, to achieve this.

I am appalled by the presentation of the plan where the evidence base has not been scrutinised sufficiently on our behalf so that residents are unable to trust its findings. It is disgraceful that sums of money have had to be raised by residents to obtain expert opinion on the vital matter of population figures and housing need.

For the THIRD time of asking, I would like to see a commitment by GBC to follow national guidance on Green Belt by way of policy throughout the entire plan. It has not done this so far.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
object to this policy for a number of reasons:

1. The wording of the policy is far too wide and ignores all other aspects of planning policy. As drafted the Planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

1. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. If the proposed housing would meet identified need and adjoins a settlement under this policy wording, permission would have to be granted even in the most sensitive AONB location, regardless of whether more suitable locations were available. The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

1. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer-led proposals which will be difficult to resist.

1. The policy wording should define “small”, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the Plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

1. The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular, I believe adding the concept of “safe and easy walking distance” extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance and school children are expected to walk further than that before being eligible for free school travel.

1. The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. The supporting text includes this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included, and that developments should remain outside the open market in perpetuity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
19. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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1. POLICY H3

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/14615  **Respondent:** 11044129 / Christopher Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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**Attached documents:**

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**Comment ID:** PSLPP16/4880  **Responder:** 11047329 / Hazel Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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<th>Respondent: 11047873 / Mary Waldner</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7596   Respondent:  11049473  /  Victor Bates   Agent:

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Comment ID: PSLPP16/12847  Respondent: 11053825 / Claire Owen  Agent:

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drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including
harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this
policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable
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The policy wording should not allow market housing. The ability to include market housing is likely to inflate land
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The policy wording should define small, either in land size or number of units. I am concerned that if small is left
undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium
development and 150 could be small.)
The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I also object to Policy H3 (rural exception homes) which loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Under existing law, an unfulfilled housing need is not an exceptional circumstance. Conversely, the existence of the Green Belt/Area of Outstanding Natural Beauty is a legitimate legal reason for not meeting objectively assessed housing need. The draft Plan fails to demonstrate substantive evidence that other development options have been thoroughly investigated and found to be untenable and therefore I object to any proposal to remove greenbelt designation from East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to
improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/16750  **Respondent:** 11070113 / Alison Hague  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

10. **POLICY H3**
I OBJECT to Policy H3 – Rural Exception Homes. The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8826  Respondent: 11071553 / Nicholas Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3 (RURAL EXCEPTION HOMES) – I object. It shouldn’t allow developers to abuse the system by building “market housing”, especially as this reduces Green Belt protections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12402  Respondent: 11074465 / Louise Vaughan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this is a Trojan horse policy

It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This Policy means building anywhere and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the Policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. If the housing would meet identified need and adjoins a settlement under this Policy, permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available. The Policy should include the need for a balancing exercise including consideration whether more suitable locations exist.
The Policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer-led proposals which will be difficult to resist.

The Policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the Policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The Policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related". Many people would regard a mile or so as an easy walking distance, school children are expected to walk further than that before being eligible for free school travel.

The wording of the Policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. For example, housing could be built for retired Cabinet Ministers under this Policy so long as the first tenant was required to have a local connection. The introduction to the Policy mentions this point, but it is not part of the Policy itself, and may carry little weight at appeal.

The blue-box Policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/6504</th>
<th>Respondent:</th>
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The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2567  Respondent: 11166081 / Charlotte Mercer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Guildford Borough Council (GBC) Local Plan 2017 on the grounds that the proposals contained in the policies H3 and all of the provisions maps diagrams and assumptions, have not been properly scrutinised by the planning committee or other relevant bodies nor by the people of the borough - by reason of copyright infringement on GL Hearn’s intellectual property.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2435  Respondent: 14177313 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 49 para 4.2.54

Not clear why this paragraph re ‘cascade’ provisions has been deleted. It is long standing and seems eminently sensible. Is it because of Appeal or Court decisions? If not-

Obj as comment above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4750  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

11. POLICY H3 RURAL EXCEPTION HOMES

11.1 I object to policy H3 Rural Exception Homes
11.2 This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

11.3 The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/692  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 I object to the change in policy H3 Rural Exception Homes.

1.2 I object to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).”

1.3 This demonstrates GBC’s disregard for local housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/113  Respondent: 15105793 / David Clue  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to the building of houses on Wisley Airfield, Garlicks Arch in Ripley/Send and Golden Hill in Clandon this will have a massive impact on these villages.

Please give a thought to how you would feel if you lived in one of these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8913  Respondent: 15107297 / Ian McQuattie  Agent:
I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy H3: Rural exception homes

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

(a) the site adjoins or is closely related to, and in safe and easy reasonable walking distance of a defined or a non-defined rural settlement, and

(b) the number, size and tenure of homes would be appropriate to meet, or to contribute to meeting, the identified local affordable housing needs of the local community

Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common

>> I agree with the removal of industrial usage (A43) on greenbelt as per National Planning Policy, but object to the inclusion of Travelling Showpeople plots.

I continue to object to the inappropriate use of ancient GreenBelt land for 400 new houses (A43). This is not sufficient justification (H3) or exceptional circumstances. This is reckless destruction of green belt.

The argument in Policy H3 that it is ok to use green belt land for affordable housing if it is reasonable asking distance to a rural settlement is also not valid. Send is a good 60min walk, and Ripley 45min. This is unreasonable.

Furthermore the local Train station at Clandon is 60min walk. Furthermore the number and size of have no bearing on the needs of the local community! We have no need in Send, Ripley or Clandon for 400 new homes.

I continue to object to the need for a new slip road, especially since it has increased in size to 4.5ha and has no stated purpose or value. It will only lead to further congestion in and around our villages which are gridlocked daily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13736  Respondent: 15227905 / Nigel Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1732  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY H3- Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix," this can include "market" housing - i.e. normal commercial development which in Guildford usually means large executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

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Attached documents:

Comment ID: PSLPP16/1800  Respondent: 15247265 / Aileen Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3: Rural exception homes

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1824  Respondent: 15247745 / Brian Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3: Rural exception homes

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1955  Respondent: 15254785 / M.D. Vickers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1976  Respondent: 15255553 / J.A. Vickers  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/1992  Respondent: 15256705 / R.V. Vickers  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):**

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to policy H3 Rural Exception Homes This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY H3 – Rural Exception Homes

We object to this policy for a number of reasons:
1. The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

2. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

3. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

4. The policy wording should define small, either in land size or number of units. We are concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

5. The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular we believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

6. The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

7. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

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Attached documents:
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Comment ID: PSLPP16/2877  Respondent: 15301089 / Brian Yeomans  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3: Rural exception homes

I OBJECT to this policy

This policy allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2956  Respondent: 15304897 / Richard Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/3432  Respondent: 15320737 / Steven Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to POLICY H3 – Rural Exception Homes

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3144  Respondent: 15323041 / Jane Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3306  Respondent: 15327905 / Julia Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/3465  Respondent: 15340929 / Claire Smylie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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1. POLICY H3

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Attached documents:

Comment ID: PSLPP16/5016  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Attached documents:

Comment ID: PSLPP16/5141  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**Comment ID:** PSLPP16/5160  **Respondent:** 15386337 / Edna Slater  **Agent:**

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Comment ID: PSLPP16/5202  Respondent: 15388673 / Bruce Stewart   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/5320  Respondent: 15389697 / Oliver Stewart  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/5367  Respondent: 15390401 / William Stewart  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/5401 **Respondent:** 15390785 / Francesca Molossi- Murphy **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY H3 - Rural Exception Homes**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5484  **Respondent:** 15398657 / Kim Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5524  Respondent: 15399041 / Sue Ely  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Attached documents:

Comment ID: PSLPP16/5660  Respondent: 15405857 / Raymond Mackay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

<table>
<thead>
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<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6020  Respondent: 15420833 / Marjorie Moss  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/16855  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY H3 – Rural Exception Homes**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6073  **Respondent:** 15422529 / David Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6188  Respondent: 15424865 / Robert Victor Ewen  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/6207  Respondent: 15426305 / I C Dean  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3 – Rural Exception Homes

I object to this policy.
1. The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy.

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1. The criteria appear to be “identified need” and “adjoins a settlement”. There seems to be no provision to balance the desirability of the development against other considerations including harm to the Green Belt or the AO.

1. The policy wording should define small, either in land size or number of units. I am concerned that if “small” is left undefined the policy could be used to justify significant development.

1. The policy wording should define “closely related” and remove the “safe and easy walking distance” concept. The latter will extend the potential radius within which sites will be argued to be “closely related”-when the secondary school in West Clandon was proposed a mile was considered “easy walking distance”.

1. The wording of the policy itself does not require the local connection requirement for tenants to be permanently secured - only affordability is secured. The supporting text includes this point, but what weight does it carry at appeal?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6277  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

17. POLICY H3

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to Rural Exception Homes that would be allowed to be permitted where the site adjoins or is closely related to a defined or a non-defined rural settlement on the grounds that this gives permission for development of these types of buildings in any area near existing dwellings. The wording of the policy is far too wide and as drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to POLICY H3 – Rural Exception Homes

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

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The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

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**Attached documents:**
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14360  Respondent: 15446401 / Louise Yandle  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):
• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7441  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**Comment ID:** PSLPP16/7443  **Respondent:** 15448385 / Edward Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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Comment ID: PSLPP16/7622  Respondent: 15450817 / Audrey Gachen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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I object to POLICY H3 – Rural Exception Homes

  • It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/7726  Respondent: 15451713 / Gaby Attwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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POLICY H3: Rural exception homes

The SGTCF supports the inclusion of pitches for Gypsies and Travellers within this policy.

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19. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8364  Respondent: 15464673 / Trudy Grey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

17. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

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The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8422  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8426  **Respondent:** 15466177 / D.L. + E.J. Wilkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

- It loosens the criteria by allowing "market housing" and development that changes the housing Developers would be able to override NPPF "exceptional circumstances" and other restrictions to build large houses in the Green Belt.

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**Comment ID:** PSLPP16/8537  **Respondent:** 15469249 / Daniel Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

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**Attached documents:**

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**Comment ID:** PSLPP16/8592  
**Respondent:** 15470145 / Linda Eyre  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**Attached documents:**

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**Comment ID:** PSLPP16/8606  
**Respondent:** 15472097 / Bernard Eyre  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8702  
**Respondent:** 15474849 / Timothy Yorath  
**Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8704  Respondent: 15475041 / Anne Geary  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/8736  **Respondent:** 15475297 / Jane Patricia Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**Comment ID:** PSLPP16/8914  **Respondent:** 15478017 / Kirstie Pankhurst  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9039  **Respondent:** 15478177 / Michelle Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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**Attached documents:**

**Comment ID:** PSLPP16/15906  **Respondent:** 15478209 / Sally Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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**Attached documents:**

| **Comment ID:** | PSLPP16/9113  | **Respondent:** | 15479201 / Nick Norton | **Agent:** |
|-----------------|---------------|------------------|------------------------|
| **Document:**   | Proposed Submission Local Plan: strategy and sites 2016 / Policy H3 |
| **Do you consider this section of the document; complies with the Duty to Cooperate?** | ( ) |
| **is Sound?**   | ( ) |
| **is Legally Compliant?** | ( ) |

I object to Policy H3
I object to this policy which allows potential development outside settlements even in Green Belt and includes wording to propose extension of this policy for market housing. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

This will allow development where it would otherwise not be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances.

Re: rural exception sites, the NPPF deals with this in NPPF 54 which states:
“In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate”. This clause makes it clear that housing in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.

The following extract from the National Planning Policy Guidance is relevant:

Paragraph: 034 Reference ID: 3-034-20140306
Can unmet need for housing outweigh Green Belt Protection?
Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt. This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need. NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are: limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme.

The wording of this policy- “contribute to meeting local needs” implies that GBC plans to use these to meet its normal housing list; “local” is defined by GBC as meaning “current or former residents of the borough or have a family or employment connection”, not “local” at all.

This policy requires revision in order to articulate the requirements under which the rural exception scheme might be permissible, making it clear that

- make it clear what the requirements are to qualify for the scheme
- ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only where there is demonstrable unfilled local need and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of rural exception sites will only apply in exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Agent:</th>
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Attached documents:

Comment ID: PSLPP16/9495  Respondent: 15482977 / Craig Robertson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy allows potential development outside settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This would allow development where it would not otherwise be permitted. The policy wording needs to explicitly limit rural exceptional to cases of demonstrable, unfilled, local need that cannot otherwise be met, providing proof of ‘very special circumstances’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9914  Respondent: 15487841 / National Federation of Gypsy Liaison Gro (A. R. Yarwood)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Consultation: Proposed Submission Local Plan: Strategy And Sites 2016

I am responding to the above consultation on behalf of the National Federation of Gypsy Liaison Groups.

We consider the plan to be unsound, non-compliant with National policy and it will not be effective in meeting the needs of Gypsies and Travellers.

Policy H3 refers to a requirement that pitches for Travellers pitches will be permitted to meet an identified need provided it is within easy walking distance of a settlement. This is unacceptable as sites so close to settlements will rarely if ever be acceptable to local communities.

The policy also requires that pitches for Travellers pitches must meet or contribute to meeting the local; affordable housing need and that they are secured as affordable homes in perpetuity. This is clearly quite inappropriate for Traveller sites.

Furthermore both elements of the policy require favourable consideration of Traveller pitches to be reliant on meeting an identified need. This is inconsistent with national policy. Paragraph 10 of Planning Policy for Traveller sites requires Local Plans to set out criteria to deal with applications irrespective of need.
Paragraph 4.2.49 says Traveller exception housing will be provided on council owned public pitches on small, suitably located sites in the Green Belt. This is not consistent with Green Belt Policy P2 which does not allow for such development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10029  Respondent: 15495873 / Gerard Duvé  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Rural Exception Homes: I am in favour of Rural Exception Homes to provide homes for local people who cannot afford 'affordable' homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10253  Respondent: 15497505 / Jyoti Nanda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10679  Respondent: 15502209 / Shirley Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H3 - Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford housing list. To make the housing viable, or to improve
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The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. [If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.] The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related". Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/10680  **Respondent:** 15502241 / Richard Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to Policy H3 - Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford housing list. To make the housing viable, or to improve
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11239  Respondent: 15570145 / Owen Eszeki  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy H3 - Rural Exception Homes
I am in favour of Rural Exception Homes to provide homes for local people who cannot afford 'affordable' homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11245  Respondent: 15570209 / Emily Cross  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I am in favour of Rural Exception Homes to provide homes for local people who cannot afford 'affordable' homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15346  Respondent: 15570817 / Tom Edelsten  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
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Comment ID: PSLPP16/11408  Respondent: 15571201 / Zoe Dudgeon  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15348</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>This policy states that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”</td>
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- **I object** to the Rural Exception Homes Policy – **Policy H3**

- This policy is too widely cast stating in effect that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB).
- Such homes are meant for people with a village connection but, as written, they could be for anyone on the Guildford Borough housing
- To make the housing viable, or to improve the “mix”, this policy allows the inclusion of “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy therefore implies building anywhere and ignoring all historic planning
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**POLICY H3 – Rural Exception Homes**

**I object** to this policy for a number of reasons:
1. The wording of the policy is far too wide and ignores all other aspects of planning policy. As drafted the Planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

1. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. If the proposed housing would meet identified need and adjoins a settlement under this policy wording, permission would have to be granted even in the most sensitive AONB location, regardless of whether more suitable locations were available. The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

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1. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included, and that developments should remain outside the open market in perpetuity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I object to Policy H3 – Rural Exception Homes which will be allowed to be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. The policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) still applies to these cases, including the need to prove “exceptional circumstances.” The wording of the policy is far too wide and makes a mockery of all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for all developments however inappropriate and unsuitable. The wording prevents balancing the desirability of the development against other considerations including harm to the Green Belt or the AONB. The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should define “small” and should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist. The wording of the policy should also be changed to require the local connection requirement for tenants to be secured in perpetuity.

The policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

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Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY H3 RURAL EXCEPTION HOMES

I object to policy H3 Rural Exception Homes

This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the 'mix', this can include 'market' housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

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<th>Respondent: 15589665 / Anna Worsley</th>
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POLICY H3 – Rural Exception Homes

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Attached documents:

Comment ID: PSLPP16/13474  Respondent: 15590593 / Johnathan Page  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/13812  Respondent: 15595681 / Willemien Downes  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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Attached documents:

Comment ID: PSLPP16/14068  Respondent: 15601057 / Chris Vinall  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Policy H3 – Rural Exception Homes as this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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Attached documents:

Comment ID: PSLPP16/14179  Respondent: 15601185 / Jane Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14217  Respondent: 15601473 / Joseph Fort  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14258  Respondent: 15601953 / Stephen Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14312  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy H3 Rural Exception Homes This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

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Attached documents:

Comment ID: PSLPP16/14488  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/16267  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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<th>Respondent: 15603489 / Simon Pitt</th>
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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Attached documents:

Comment ID: PSLPP16/14883  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14900</th>
<th>Respondent: 15608545 / Madeleine Ringshaw</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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<tr>
<th>Comment ID: PSLPP16/15218</th>
<th>Respondent: 15610785 / Liz Vinall</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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Attached documents:

Comment ID: PSLPP16/15405  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):
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Attached documents:

Comment ID: PSLPP16/15492  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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<th>Comment ID: PSLPP16/15645</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
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Comment ID: PSLPP16/15646  Respondent: 15618337 / Matthew Pitt  Agent: 

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Comment ID: PSLPP16/15695  **Respondent:** 15619041 / Jack Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy H3 - Rural Exception Homes**

I am in favour of Rural Exception Homes to provide homes for local people who cannot afford 'affordable' homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15736  **Respondent:** 15623745 / Stella May  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I object to this policy for a number of reasons:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID:** PSLPP16/16808  **Respondent:** 15652833 / Don Babington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

POLICY H3 – Rural Exception Homes

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID:** PSLPP16/17130  **Respondent:** 15666625 / Anna Ruddy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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Comment ID: PSLPP16/17597  Respondent: 15688481 / Sally Lescher  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/18447  Respondent: 15724353 / Arvnid Parmar  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3  
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The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/18516  **Respondent:** 15725409 / Nicholas Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY H3 – Rural Exception Homes**

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Our Client consider that within the context of a Spatial approach that looks to identify the most sustainable locations within village settlements there is little merit in maintaining a rural exception homes policy.

As an alternative it is considered to be a more robust strategy to specifically allocate all of the suitable sites within or immediately adjoining the defined village settlement boundaries in order to directly contribute to the Council’s housing target. This is more likely to achieve the target of 90 units than from currently unidentified rural housing schemes which are likely to be few and far between.

Nonetheless, if this policy is to be maintained, in order for it to be realistically workable, the ability to include public subsidy within a rural exception scheme, as outlined in paragraph 4.2.52, should be specifically written into the policy text. Furthermore, the Council should not impose artificial limits on the level of market housing needed to support rural housing schemes but should objectively consider any scheme which seeks to deliver affordable units above the adopted policy target.

The additional caveats set out under paragraphs 4.2.53 and 4.2.54 are not considered to be justifiable and serve to further undermine the workability of this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to the change in policy H3 Rural Exception Homes.

We object to the deletion of para 4.2.51 “To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).” This demonstrates GBC’s disregard for local housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</th>
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<tr>
<td><strong>OBJECT. This policy means building anywhere, ignoring historic planning restrictions, it is a Trojan Horse.</strong></td>
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<th><strong>Comment ID:</strong> pslp171/337 <strong>Respondent:</strong> 17267393 / Steve Knight <strong>Agent:</strong></th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy H3</td>
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Page 275 of 279
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Paragraph 54 of the NPPF refers to rural exception sites as follows:

‘In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs’.

The final sentence of the above quotation refers to the potential for some market housing to be allowed to facilitate affordable housing delivery. This is also referred to in the Plan itself at paragraph 4.2.52. We therefore propose that the following additional bullet point is added to Policy H3:

• ‘market housing will be allowed where it has been proved that is necessary to make the affordable housing provision viable’

The above wording would enable Policy H3 to be more consistent with national policy in accordance with the NPPF tests of soundness.

Proposed Change:
The addition of the wording suggested above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The final sentence of the above quotation refers to the potential for some market housing to be allowed to facilitate affordable housing delivery. This is also referred to in the Plan itself at paragraph 4.2.52. We therefore propose that the following additional bullet point is added to Policy H3:

• ‘market housing will be allowed where it has been proved that is necessary to make the affordable housing provision viable’

Attached documents:
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy P1- Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value
Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

We very warmly welcome improvements to this policy which better captures the importance and value of the AONB.

We further suggest the following clarifications to avoid ambiguity:

- It is most important that “promote its enjoyment by the community and visitors to the area” specifies “enjoyment of its special landscape qualities”
- After “proposals will be assessed on their individual merits,” add, ”as to whether they are consistent with conserving and enhancing the special landscape qualities,”.
- The text should note that potential AONB will be based on landscape assessment by Natural England on behalf of the Minister and may include land not currently designated as AGLV.

We suggest the monitoring indicator is inappropriate. It should track absence of major development (which is in principle harmful to the statutory purpose even when deemed in the public interest) not avoidance of appeals. The currently proposed indicator could encourage the perverse behaviour of avoiding appeals.

**Object**: seeking improvements

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
These are enduring features, if not statutory purposes, that will survive any update of the Management Plan. Development will benefit from this steer.

We sustain our objection to the Monitoring Indicator which could encourage the perverse behaviour of avoiding appeals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/6263  **Respondent:** 8557985 / Artington Parish Council (Philip Gorton)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Relationship between Green belt and Surrey Hills AONB**

In his foreword Councillor Spooner stresses that the Local Plan will conserve and enhance the unique qualities of our natural and built environment, especially in the Surrey Hills Area of Outstanding Natural Beauty. However, the plan proposes to in-set from the Green Belt parts of Mount Browne and The University of Law sites, both of which lie within the Surrey Hills AONB. Paragraph 115 of the NPPF makes it clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty, indeed AONB has equal statutory protection to a National Park.

Development proposals within and adjacent to the AONB should conserve and enhance its special qualities. The proposal to in-set removes a level of protection and is contrary to Councillor Spooner's stated goals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1668  **Respondent:** 8557985 / Artington Parish Council (Philip Gorton)  **Agent:** Green Balance

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

65. Save Hogs Back welcomes the proposed changes to Policy P1. In particular we support the more positive approach to sustaining AONB qualities and the greater attention given to protecting the setting of the AONB in paragraphs (3) and (5). We also particularly welcome the retention of the AGLV designation in the manner set out in paragraph (5).

66. We also welcome the updated clarification of the status of Areas of Great Landscape Value in paragraph 4.3.8 of the Reasoned Justification.

67. Unfortunately, the policy (particularly as amended) is not always applied through the Plan as a whole. The strategic allocation of land for housing in Policy A26 at Blackwell Farm is in direct conflict with Policy P1 as amended and is the most significant proposed release of a greenfield site that has major adverse impacts on the AONB. A small part of the allocation is also included within the AGLV. The Blackwell Farm site allocation conflicts with Policy P1 and should be removed from the Plan.

68. The proposal in Policy A26 would in summary involve:
The first and most important point to make is that the Guildford Society has supported, and does support the intent of Guildford Borough Council to adopt a Local Plan for the Borough as soon as possible that protects and enhances our past heritage and urban and rural character, whilst promoting and enabling sustainable growth. We do not seek to frustrate this process, but we do need to see a robust, reliable and effective Local Plan a sound Local Plan.

There is much to like about the revisions to the plan. In some places, the draft plan has been strengthened with greater emphasis on and preservation of heritage, countryside and visual amenity, notably in the following policies and paragraphs:

Contents List Policy P1; paragraphs 2.1, 4.1.1, and 4.1.4; Policy P1 (inclusion of Areas of Great Landscape Value); paragraphs 4.4.56, 4.4.59, 4.4.67, and 4.4.68; several items in Policy D1, and many in D4. We welcome all of this.

There remain areas about which we are particularly concerned, not least of which is the omission of any real planning for the regeneration of and infrastructure in the town centre.

We have been, and remain, concerned that we have not seen the second part of the Local Plan the Development Management Local Plan in any shape or form and we are not sure (a) what protections that plan will afford, nor (b) how effective reliance on parts of the Local Plan 2003 will be in the meantime. This second part of the local plan will be an important document, and many of our comments on this first part of the plan may be dealt with in the second part.

We recognise the amount of hard work the Officers and Lead Councillors have done to get the plan to this stage and the several million pounds paid on consultants to help inform the plan.

We have, however, been disappointed by the lack of interaction Guildford Borough Council with groups like the Guildford Society during the process of getting the draft plan to this second Regulation 19 consultation (in contrast to the Local Plan Forum which was convened following the 2014 consultation and disbanded in 2015), and we are struck by the
amount of red ink on the amended plan and, moreover, by a substantial reorganisation and rewriting of key parts of the evidence base. Our response has been prepared as a community group without recourse to professional advice. We have responded as a suite of documents due to the complexity of making our comments through the online portal. We believe there is no reason why such a response made in this way should receive any less consideration than comments received through the portal. For ease of reference, (but not to the exclusion of any part of this document) we have attempted to provide responses, in the next section of this document, to the questions provided.

There have been substantial and substantive changes to the Local Plan and its Evidence Base. The Guildford Society’s team of volunteers have tracked each successive consultation (including its associated evidence base at the respective times) and these are available to view on the Guildford Society website and at:

- 2013: Issues & Options Consultation Documents
  [http://wp.me/p3KMtD-64](http://wp.me/p3KMtD-64)

- 2014: Regulation 18 Consultation Documents
  [http://wp.me/p3KMtD-8Y](http://wp.me/p3KMtD-8Y)

- 2016: Regulation 19 Consultation Documents
  [http://wp.me/p3KMtD-iN](http://wp.me/p3KMtD-iN)

- 2017: Regulation 19 Consultation Documents
  [http://wp.me/p3KMtD-nc](http://wp.me/p3KMtD-nc)

The Guildford Society has held several public meetings to help explain to our members and wider public about the various evidential documents and consultations, and feedback from those sessions have informed our responses to each successive, respective consultation:

- 2013: Issues & Options Consultation Response
  [http://wp.me/p3KMtD-6M](http://wp.me/p3KMtD-6M)

- 2014: Regulation 18 Consultation Response
  [http://wp.me/p3KMtD-dG](http://wp.me/p3KMtD-dG)

- 2016: Regulation 19 Consultation
  [http://wp.me/p3KMtD-mH](http://wp.me/p3KMtD-mH)

Whilst the 2017 Regulation 19 draft submission plan has tracked changes and the scope of the consultation is required by Guildford Borough Council to be limited to the changes, there are sufficient alterations to the evidence as to throw the integrity of the plan itself into question, and so this response is not restricted to the red lines in the plan. We have attempted, however, to restrict our comments and responses to the changes in plan and evidence base since the previous Regulation 19 consultation in 2016.

We would also like to point out that a considerable amount of this commentary could have been provided informally to Councillors and Officers had the leadership of Guildford Borough Council (Leader, Deputy Leader and the then Managing Director) not decided to restrict access by the Guildford Society and the Guildford Vision Group to officers and Councillors.

The Guildford Society has recognised the urgent need for a Local Plan and has sought to be firm but objective. We have been concerned from the beginning of the process (well before any consultations, and bearing in mind this plan has been in gestation for about ten years) that the Plan was developed first, followed by the evidence. There remain gaping holes in the draft Local Plan itself, not least in the Town Centre, where there is an almost complete absence of plan making.
The Society has formally pointed out errors and omissions on three separate occasions (upon publication of the evidence base as part of the Issues and Options consultation, and the R18 and R19 regulation consultations in 2014 and 2016 respectively). For example, the errors strewn throughout the Settlement Profile Report—e.g., Peasmarsh still shows as having as its nearest convenience shopping the parade at East Horsley, a substantial distance on the opposite side of Guildford! This is a Council-generated document, and could have been corrected at any stage. Far worse, in that same document, is the lazy treatment of the Guildford Urban Area (including more than half of the Borough’s residents) as a single settlement—making it much more difficult to plan proactively and proactively for much of the urban area. Our most comprehensive response was to the initial Regulation 18 consultation in 2014.

We do not intend to repeat the representations made at that time. We are, however, disappointed that, three years later, many of our comments have gone unresolved and unrecognised for example, lan in a timely manner, that may have been understandable in 2014. It beggars belief in 2017 that the evidence has not been completed and suitable adjustments made. There is much to like about the revisions to the plan. In some places, the draft plan has been strengthened with greater emphasis on and preservation of heritage, countryside and visual amenity, notably in the following policies and paragraphs:

I. Contents List Policy P1;
II. paragraphs 2.1, 4.1.1, and 4.1.4;
III. Policy P1 (inclusion of Areas of Great Landscape Value);
IV. paragraphs 4.4.56, 4.4.59, 4.4.67, and 4.4.68;
V. several items in Policy D1, and many in D4.

We welcome all of this.

This response is extensive as we recognise the amendments are also substantial when the updated evidence base is taken into account. It may often seem as though our comments are negative or obstructive. That is not our intention. We aim to help Guildford Borough Council to settle on the best plan we can achieve, and we stand ready to work with Guildford Borough Council to achieve it.

The evidence base itself points to work streams (for example on flood risk management) that are ongoing but incomplete. We recognise there will always be ongoing work to better understand and plan for the town and borough, and it is likely, therefore, that we will be asked to adopt an incomplete plan. It is, however, very hard to respond to this plan without highlighting areas in which it is incomplete or deficient. We fear some of these areas may in themselves make the plan unsound, and we highlight those areas.

We hope, should the plan be submitted in more or less the form we have commented on, that there will be constant and early reviews to enable key topics such as the town centre, infrastructure and flood risk to form a comprehensive, firm basis for planning the borough’s spaces and places.

tt) We welcome the addition of ‘Area of Great Landscape Value’ to Policy P1.

uu) At Policy P1(2) The Guildford Society does not perceive that a new junction on the A31 linking to Blackwell Farm, etc, is compliant with the ‘presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest’, although we suspect this form of words has been introduced as a Trojan Horse to seek to achieve such development. We consider the paragraph should end at AONB

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

We object to this policy as we are concerned it weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. The policy should be tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Policy No. and title</th>
<th>2016 WHPC position</th>
<th>2016 WHPC comment in brief</th>
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<tr>
<td>P1 – Surrey Hills Area of Outstanding Natural Beauty (AONB) and Area of Great Landscape Value</td>
<td>Supports</td>
<td>Protecting this area should be given the highest priority</td>
<td>Objects to the weakening of the policy controls</td>
<td>Policy statement extensively reworded, and as a result, is weaker in its protection of the Surrey Hills AONB and AGLV land. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to the weight of protection given to AONB in the NPPF</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2179  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P1 Surrey Hills Area of Outstanding National Beauty This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they…” “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should, therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc.

Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater...
I object to policy P1 Surrey Hills Area of Outstanding National Beauty This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they…” “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact on views into and out of the AONB and which do not respect the setting, will not be acceptable” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)
The criteria and parameters under which this policy is measured have been diluted leaving this policy open to interpretation. This is of particular concern when the Chairman of Surrey Hills is not in a position where he can be completely impartial.

I object to the removal of the statement relating to the presumption against major development in AONB and the authorities responsibility to ensure that AONB affords the highest protection.

I object to the obvious efforts to dilute this policy to enable development by referring to case by case when the NPPF makes it very clear that AONB should be protected.

It is also of great concern that the majority of Blackwell Farm was assessed by a professional independent as fulfilling the criteria for AONB yet this report has been ignored. The AONB review should take place and Blackwell farm should be reviewed as part of this process.

The Council must review the AONB in conjunction with the Surrey Hills board.

I object to the removal of the statement relating to the presumption against major development in AONB and the authorities responsibility to ensure that AONB affords the highest protection.

I object to the obvious efforts to dilute this policy to enable development by referring to case by case when the NPPF makes it very clear that AONB should be protected.

It is also of great concern that the majority of Blackwell Farm was assessed by a professional independent as fulfilling the criteria for AONB yet this report has been ignored. The AONB review should take place and Blackwell farm should be reviewed as part of this process.

The Council must review the AONB in conjunction with the Surrey Hills board.

I believe there is a conflict of interest when the Chair of the board is also a Cllr.

Key evidence

Should include external professional independent reviews (this applies to all policies).

Monitoring Indicators

Can be represented as a percentage but this us usually a way of hiding actual numbers, which should be made clear. As the definition for 'major development' has been obfuscated, it cannot then be listed as an indicator? It must therefore be defined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13037  Respondent: 8573793 / Harry Eve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object

57. While I fully support protection of the AONB from inappropriate development I am not convinced that the current wording will achieve that. The recent proposals for Newlands Corner indicate one way in which this wording could be used to justify inappropriate development in the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
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<th>Comment ID: pslp171/1677</th>
<th>Respondent: 8573793 / Harry Eve</th>
<th>Agent:</th>
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<tr>
<td>The changes seem to weaken protection of the AONB and may be used to facilitate inappropriate non-major development. I object to removal of the tests.</td>
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<tr>
<td>It is not at all clear what will be regarded as major development.</td>
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<tr>
<td>There are areas of high landscape and heritage value that are not within the AGLV and AONB and that are placed under additional threats by this draft plan. They have no such protection despite being “areas of outstanding natural beauty and great landscape value” in fact (if not by designation) and in the opinion of those who visit them for that reason.</td>
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<tr>
<td>The scope of the review should be re-considered to include areas not within the AGLV and the scope should be open to consultation.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPP16/5951</th>
<th>Respondent: 8575585 / Ian Macpherson</th>
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<tr>
<td>Policy Pl: Surrey Hills Area of Outstanding Natural Beauty (AONB)</td>
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<td>supported, parti cularly the re-examination of AGL Vs.</td>
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<th>Comment ID: PSLPP16/6984</th>
<th>Respondent: 8575617 / Effingham Parish Council (Ian Symes)</th>
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<td>P1 Protecting - Surrey Hills AONB</td>
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<td>Support</td>
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<th>Comment ID: PSLPP16/17551</th>
<th>Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)</th>
<th>Agent:</th>
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Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

The first sentence in Policy P1 box should be concerned with conserving the natural beauty of the AONB, which is the prime purpose of the AONB, and the wording should follow the wording in the Act as given in paragraph 4.3.1 as follows:

“Areas of Outstanding Natural Beauty (AONB) were originally identified via the National Parks and Access to the Countryside Act 1949, with the primary purpose to conserve the natural beauty of the landscape” (para.4.3.1).

Policy Box P1:

Paragraph 1, bullet point 3: It is written in this bullet point: “promote its enjoyment by the community and visitors to the area”. The enjoyment should come from ‘natural beauty’ and landscape.

Paragraph 4: The AGLV should be strongly protected in line with protection given to AONBs as the forthcoming AONB/AGLV review by Natural England is awaited.

In Para. 4.3.6, it is written: “Applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public interest.” Exceptional circumstances in the Draft Local Plan 2016 have been weakened to allow proposed large-scale developments in the Green Belt. Should the same ‘Exceptional circumstances’ apply to the AONB, its
protection will also be considerably weakened.

Para. 4.3.9: It is written that: “The current Surrey Hills AONB Management Plan (2014-2019) acknowledges these wider values and interprets the AONB as a ‘living landscape’, which constantly changes across seasons and in response to the many social and economic forces placed upon it.” Environmental considerations should also be considered, such as the protection of the natural beauty of the AONB, and similar wording should be added to this paragraph.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2455</th>
<th>Respondent: 8585601 / Jennie Kyte</th>
<th>Agent:</th>
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POLICY P1 Box: Surrey Hills of Outstanding Natural Beauty and Area of Great Landscape Value

The addition of the words: “and Area of Great Landscape Value” is welcomed.

(3) It is written “High priority will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to its setting.”

The words ‘and views into and out of the AONB should be protected’ should be added to this sentence.

It has been a long established policy to protect views into and out of the AONB. In Policy RE5 Area of Outstanding Natural Beauty of the 2003 Local Plan, it was written that: “Important views to and from the Area of Outstanding Natural Beauty should be retained.”

This was further emphasized in para.10.25 with the words: “Development should not result in the loss of important views to and from the AONB.”

G5 Design Code in the 2003 Local Plan strongly protected established views.

Guildford is made up of hills and views, and views into and out of the AONB is one of the foremost reasons why Guildford is so attractive. Such views are important for the quality of life of residents and for tourists visiting Guildford.

I support the sentence in P1 (3) above, but object to the omission of the words ‘views into and out of the AONB’. What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/8071 | Respondent: 8587489 / University of Surrey (Malcolm Parry) | Agent: |
Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Protecting Policies: The Protecting Policies P1 “AONB”, P2 “Green Belt” and P3 “Countryside” are supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2108  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

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

We welcome the inclusion and content of this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17632  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)  Agent: Strutt & Parker LLP (Rachel Patch)

We support the wording and broad thrust of this policy. Its current wording acknowledges that whilst the main priority is the conservation and enhancement of the AONB, there is a need the need to allow some development, providing it meets certain key criteria as listed in the policy. Natural England is committed to undertaking a review of AONB boundaries, which also should be given due consideration by the Council.

The Loseley Estate controls a number of buildings within the AONB, which are in use and/or being considered for more viable uses to further support the rural economy of the Surrey Hills.

It is important that flexibility is retained to ensure that businesses located within rural areas are able to adapt to changing business circumstances in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11186  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We support the wording and broad thrust of this policy. Its current wording acknowledges that whilst the main priority is the conservation and enhancement of the AONB, there is a need the need to allow some development, providing it meets certain key criteria as listed in the policy. Natural England is committed to undertaking a review of AONB boundaries, which also should be given due consideration by the Council.

The Loseley Estate controls a number of buildings within the AONB, which are in use and/or being considered for more viable uses to further support the rural economy of the Surrey Hills.

It is important that flexibility is retained to ensure that businesses located within rural areas are able to adapt to changing business circumstances in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P1 - Surrey Hills Area of Outstanding Natural Beauty

I object that the AONB areas are excluded from taking a proportion of new housing developments. Large developments are inappropriate but these areas should provide homes for local people and their families. Policies H2 and H3 should apply throughout the borough, including AONB, but proportionate and sympathetic to each location. Everywhere should be allowed some growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17506  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P1 : Surrey Hills Area of Outstanding Natural Beauty (AONB)

The Surrey Hills AONB is countryside of national importance and should therefore be provided with the highest level of protection. The draft policy needs to be strengthened so that it includes a more robust defence of natural beauty which must be conserved and enhanced.

We have decided to express our objection to Policy P1 by suggesting the following alternative wording which we believe would be more readily acceptable:

“POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) and of Great Landscape Value (AGLV)

4.3.1 The Surrey Hills AONB is countryside of national importance and has equal statutory protection to a National Park. The whole of the AONB is classified as an Area of Great Landscape Value (AGLV) and this extends beyond the AONB boundary with the objective of protecting its distinctive landscape character. AONBs were originally identified via the National Parks and Access to the Countryside Act 1949, with the primary purpose to conserve the natural beauty of the landscape

4.3.2 The Surrey Hills offers some of the most beautiful and accessible countryside in England. The North Downs National Trail runs along their length and is characterised by its important views across distinctive landscape which includes chalk grassland, woodland, heaths, commons and agricultural land. An important objective of planning is to conserve and enhance the natural setting of the AONB and to protect its unspoilt character and tranquillity.

4.3.3 Dark skies at night and the lack of air pollution and noise disturbance are for example a feature of the Surrey Hills countryside at the Devil’s Punchbowl near Hindhead since the A3 tunnel with its traffic has gone underground. Protecting a sense of remoteness and natural beauty in the landscape should be reinforced in all parts of the Surrey Hills AONB within Guildford Borough.
4.3.4 Natural England are scheduled to make a review of the AONB boundary with the intention of extending the size of the Surrey Hills. While the AGLV has acted as a buffer to the AONB, it also has its own inherent landscape quality, which contributes to the rural environment in its own right and preserves views from and into the AONB. It should continue to provide long standing protection across the county to important countryside and is to be considered equivalent in quality to the AONB.

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) and Area of Great Landscape Value (AGLV)

The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to reinforce its special landscape qualities and protect it from development. All such proposals will be assessed against the provisions of the current Surrey Hills AONB Management Plan. There will be a presumption against major development in the AONB. Proposals within the AGLV will be required to demonstrate that they would not result in harm to the AONB or to the distinctive character of the AGLV itself.

Reasoned Justification

4.3.5 Paragraph 115 of the NPPF makes it clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. Any and all development proposals within and adjacent to the AONB will be expected to conserve and enhance its special qualities.

4.3.6 Paragraph 116 states that planning permission should be refused for major developments in these designated areas unless exceptional circumstances are demonstrated.

4.3.7 No change will be made to AGLV status pending completion by Natural England of its review of the AONB boundary. The role that the AGLV plays in protecting this nationally important countryside should then be confirmed and its importance in maintaining landscape character and quality recognised both within and outside the AONB boundary.

4.3.8 The policies outlined in the Surrey Hills AONB Management plan apply not only to Guildford but to all relevant districts and boroughs across the county. This document is a key tool in the decision-making process regarding AONB and AGLV countryside. The management Plan is also an important material consideration in determining planning applications within and adjacent to the AONB”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1981  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
CPRE welcomes the inclusion of “Area of Great Landscape Value” in the heading of this Policy.

CPRE would like to have seen a reference to the current public objection to development at Newlands Corner. It should be made clear that any proposal for this site from the Surrey County Council, Surrey Wildlife Trust, and the Albury Estate will be subject to review by the GBC Planning Committee and the AONB Board.

No reference is made to the Surrey Hills AONB Board or its Planning Adviser which is regrettable as the Surrey Hills Management Plan for the period 2014-2019 is a material consideration, and approval has to be secured for this plan every 5 years for all relevant districts across Surrey, and not just for Guildford alone.

Part of the AONB countryside value to the community is its tranquility which should be protected against road, rail, and air traffic noise. Nationally important countryside should also benefit from “dark skies at night” which requires strict control over all forms of lighting. For example, any proposal for a roundabout on the Hogs Back would go against policy as it would require street lighting that would be visible over a long distance and undermine nationally important countryside.

CPRE notes the revised housing number for the Blackwell Farm development but still regards the figure as too high and merely sees the reduction as a postponement in timing allowed for completion of the original target figure. Erosion of the Metropolitan Green Belt on such a scale is made even worse by the proposed road link up to the A31 which CPRE considers will be unsightly, harmful to nationally important countryside both by day and by night, and excessively impracticable both in terms of cost and traffic congestion. CPRE endorses the study prepared by Green Balance for Save Hogs Back in this context. We also endorse the submissions made by Artington, Compton and Worplesdon Parish Councils on this topic.

Another remaining point relates to the lack of any reference in P1 to the fact that Mount Browne and the University of Law are both located within the AONB as well as the Green Belt. The policy governing any proposed development for these sites must therefore be considered in an AONB context.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1251</th>
<th>Respondent: 8608865 / WBDRA. (David Bird)</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>WBDRA would SUPPORT this policy BUT ONLY SUBJECT TO the recommendations made by Land Management Services Ltd which specifically dealt with the Hogs Back are implemented.</td>
</tr>
</tbody>
</table>
These recommendations were contained in their report called "Hog's Back Natural Beauty Evaluation" published in May 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2387  
Respondent: 8609217 / West Clandon Parish Council (John Stone)  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

We object to this policy as we are concerned it policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. It should be tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18635  
Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We note and support the following policies in the Plan:

Policy P1 Surrey Hills AONB and Policy P2 Green Belt  We are delighted to see that GBC understands the importance of protecting the Surrey Hills AONB and appreciates “the high quality of AGLV in its own right” together with the presumption against development within the Green Belt. We strongly urge GBC to respect the principles of this policy by maintaining the AGLV and Green Belt status of the sites behind Shalford Village Hall and Christmas Hill (see Sections 5 and 6), and by reviewing its proposals to inset the Tillingbourne Valley villages of Chilworth and Shalford (see Section 4).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9837  
Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
In principle – support subject to the recommendations made by Land Management Services Ltd in their report entitled “Hog’s Back Natural Beauty Evaluation” dated May 2016 being implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2476  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In principle – support subject to the recommendations made by Land Management Services Ltd in their report entitled “Hog’s Back Natural Beauty Evaluation” dated May 2016 being implemented.

[see attached document]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (6.0 MB)

Comment ID: PSLPP16/10072  Respondent: 8640353 / Julian Cranwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Policy P1 Surrey Hills Area of Outstanding National Beauty

Whilst the Guildford Greenbelt Group welcomes the inclusion of a policy to protect the AONB within its submission draft of the Local Plan, we strongly object to Policy P1 and its supporting text, which we consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

Much of our concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

“All proposals will be considered against whether they…”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”
This whole opening clause is unnecessary and almost invites development proposals. We believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, we are also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

We believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

- “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
- “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
- In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, we would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. We consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPP16/1541</th>
<th><strong>Respondent:</strong> 8687041 / Michael Aaronson</th>
<th><strong>Agent:</strong></th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
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</table>

I OBJECT, because this is a weak Policy and provides insufficient protection against development within the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/1069</th>
<th><strong>Respondent:</strong> 8687265 / Dagero Ltd (David Roberts)</th>
<th><strong>Agent:</strong></th>
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</table>

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/11630</th>
<th><strong>Respondent:</strong> 8721857 / Andrea Lightfoot</th>
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This policy weakens existing protections

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/9054</th>
<th>Respondent: 8723809 / Sally Blake</th>
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</table>

I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

- This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.
- The wording in paragraph 4.3.9, Policy P1, and the bullet points in the first paragraph of Policy box P1, could be interpreted to allow spectacular viewpoints and features in the AONB to be commercialised with visitor centres, shops and man-made additions for play areas. These would contravene the 1949 National Parks and Access to the Countryside Act 1949, which established the AONB "for the primary purpose to conserve the natural beauty of the landscape." (paragraph 4.3.1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp171/1708</th>
<th>Respondent: 8726689 / David Shaw</th>
<th>Agent:</th>
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The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/930</th>
<th>Respondent: 8726721 / Rosemary Mitchell</th>
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This area must be protected at all costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/9468</th>
<th>Respondent: 8728865 / Neville Bryan</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object.

We like the concept of the policy, but the wording leave us to believe this will weaken the AONB protection. Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

The AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and I would like to see the following sentences reinserted:

“*The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered*”

“*Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable*”

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

I would also like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. All land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16909  Respondent: 8728865 / Neville Bryan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object.

We like the concept of the policy, but the wording leave us to believe this will weaken the AONB protection. Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

We are also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, i.e. landscape character, scenic beauty, important views, tranquillity etc. Whether or not a development supports the rural economy or provides public access is of far less national importance than preserving the quality of the landscape itself.

The AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and we would like to see the following sentences reinserted:

“*The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered*”
“Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

We would also like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. We consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<td>Object - All original objections remain</td>
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<td>The amended policy wording still appears to weaken the AONB protection. We maintain the requirement of this policy is to fully consider the AONB build policy against the 5 key tests.</td>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<th>Comment ID: pslp171/2047</th>
<th>Respondent: 8729217 / Karen Stevens</th>
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<td>I support the changes to Policy P1, and particularly the addition of the following:</td>
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(2) In accordance with national planning policy, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest. (P1 (2))

(3) High priority will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting. (P1 (3))

However, the strategic allocation of land for housing in Policy A26 at Blackwell Farm and the proposed extension to the Research Park (policy E4) are in direct conflict with these amendments. The Blackwell Farm site allocation is the only significant proposed land release which will impact significantly on the AONB. No exceptional circumstances have been put forward for developing this site, and therefore it should be removed from the Local Plan. These impacts of developing Blackwell Farm are:

• A new access road through the AONB and AGLV. The Deputy Leader has stated that the Blackwell Farm development is dependent on a new “western link” road from the A31 (Hog’s Back) to Gill Avenue. Because the road would have to be built along a corniche, the earthworks required would create a huge scar on the northern face of the Hog’s Back ridge,
which would be visible for miles to the west, as well as from the public footpaths/bridleways that cross the Farm.

- A 1,800-home development, as outlined in policy A26, would damage the setting to the AONB and this is contrary to national planning policy and to the amended policy P1 (3).
- Part of the 1,800-home development site has also been put forward as an AONB candidate area. An independent land evaluation by professional landscape architect Land Management Services (Annex 2) concluded that the majority of the Blackwell Farm site merited AONB status, and that the rest of the site should not be developed as it forms an important “buffer”/“setting”. This evaluation has been submitted to Natural England (NE) by Anne Milton on behalf of three parish councils so that the site can be included as a candidate area for NE’s forthcoming boundary review.
- The extension to the Surrey Research Park (Policy E4) would damage the setting to the AONB and is contrary to national planning policy and to the amended Policy P1 (3) in this version of the Plan. The area earmarked for the Research Park extension would be visible from the Mount – a popular recreation area in the AONB.

Under key evidence, I object to the omission of the Hog’s Back Natural Beauty Evaluation carried out by Land Management Services (LMS) on behalf of Compton, Worplesdon and Wanborough parish councils, which was submitted in response to the 2016 consultation by Compton Parish Council and by CPRE/Save Hogs Back. GBC has failed to recognise Blackwell Farm as a candidate area and has omitted this new study (of which it was aware) from its key evidence supporting Policy P1 (4.3.10), although it has included a similar landscape evaluation by Hankinson and Ducket, commissioned by Surrey County Council in 2013.

I consider it unsound to exclude a study from the consultation evidence base, which follows the same assessment criteria as the Surrey CC evaluation, and which has been carried out by a registered landscape practice (a consultancy that the Surrey Hills AONB Board has itself used). Please note that the Surrey CC evaluation study did not report its findings on the entire Blackwell Farm site on the basis that Surrey CC only had to put forward a case for areas that it proposed should be included in the AONB following NE’s boundary review. It was also not able to provide any detailed evaluation of different parts of the Blackwell Farm site following an FOI request.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Annex 2 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (6.0 MB)
- KJS 2017 consultation response (rev 01F).pdf (7.6 MB)
The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1633  **Respondent:** 8746465 / Matthew Tipper  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2004  **Respondent:** 8748801 / N J Norton  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P1 Blue Policy Box
I object to all additions and removal of text from the Policy P1 blue policy box.

The Policies Map is an inadequate representation at all levels of detail of the protections required by the Surrey Hills AONB and locally designated AGLV land.

I propose the contents of the blue policy box for Policy P1 revert to their previous content as follows:

"(1) The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they:

• conserve and/or enhance the setting and views of the AONB
• conserve wildlife, historic objects or natural phenomena within it
• promote its enjoyment by the community and visitors to the area
• support the rural economy of the Surrey Hills area
• provide or maintain public access to the AONB.

(2) In accordance with national planning policy, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest.

(3) High priority will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting.

(4) Development proposals will also be assessed against the provisions of the current Surrey Hills AONB Management Plan.

(5) The AGLV will be retained until such time as there has been a review of the AONB boundary. Development
Proposals within the AGLV will be required to demonstrate that they would not result in harm the setting of to the AONB or the distinctive character of the AGLV itself.

Para 4.3.5
I object to the removal of the text of paragraph 4.3.5, page 52
"As the local planning authority we have a duty and an opportunity to ensure that this is achieved." The removal of this text illustrates the complete abrogation of public duty encompassed by the current leadership of this council. I propose the sentence "As the local planning authority we have a duty and an opportunity to ensure that this is achieved." is returned to paragraph 4.3.5, page 52.

Para 4.3.6
I object to the removal of the text of paragraph 4.3.6, page 52 as follows:
"Applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public's interest."

Apart from illiterate use of the apostrophe, this is a further attempt by the council to avoid its statutory duty to protect the AONB from inappropriate development, leaving it open to any housing or commercial development. I propose paragraph 4.3.6 is returned to its original content as follows:
"Applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public's interest. In considering major applications in the AONB, the Council will have regard to the principles outlined in Policy 8 and Paragraph 116 of the NPPF. Whilst there remains a lack of national guidance, the Council will define ‘major development’ on a case-by-case basis, taking into account relevant factors such as the size, scale and setting of the proposed development."

Para 4.3.8
I object to the changes to paragraph 4.3.8, page 53.
I propose the reinstatement of paragraph 4.3.8 to its original content as follows:
"4.3.8 Natural England has subsequently agreed to undertake a review of the AONB boundary and will consider further evidence presented to them. The review is not anticipated to commence until 2018 at the earliest. In the meantime, the candidate areas identified will retain their current status as AGLV."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Development on the scale proposed would have a significant impact on the AONB. Through changing the character of the surrounding landscape and increasing pressure on wildlife habitats, such development, both of the individual parcels identified and on the overall scale proposed in the plans, would reasonably be expected to give rise to additional traffic past and through the AONB which in turn would erode the character of the rural roads in the area, and have a detrimental impact on the AONB.

I feel that a more suitable approach would be to further strengthen the protections afforded to East and West Horsley and neighbouring villages along the A246 (including Clandon, Effingham and Bookham), rather than encouraging additional development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/10249</th>
<th>Respondent:</th>
<th>8768161 / Adam Johnson</th>
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<td>is Legally Compliant?</td>
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**Effect of the Proposals on the Surrey Hills Area of Outstanding Natural Beauty.**

West Horsley is adjacent to the Surrey Hills Area of Outstanding Natural Beauty, which as you will be aware was designated in 1958 in order to preserve and safeguard the outstanding countryside for the benefit of all. As such, West Horsley forms an important part of the context or the AONB. The AONB boundary runs just to the South of the A246, within around 1 mile from the village.

The proposed inset of the village within the Green Belt means that further intensive development will be possible right up to the AONB boundary, and additionally the proposed development site adjacent to the "Bell and Colvill" Garage at West Horsley, for which 40 houses are planned, would bring unsuitable intense development to a site which is far closer to the boundary of the AONB, and which is adjacent to a site of Great Landscape Value.

Development on the scale proposed would have a significant impact on the AONB, through changing the character of the surrounding landscape and increasing pressure on wildlife habitats. Such development, both of the individual parcels identified and on the overall scale proposed in the plans, would reasonably be expected to give rise to additional traffic past and through the AONB which in turn would erode the character of the rural roads in the area, and have a detrimental impact on the AONB.

I feel that a more suitable approach would be to further strengthen the protections afforded to East and West Horsley and neighbouring villages along the A246 (including Clandon, Effingham and Bookham), rather than encouraging additional development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>is Sound?</td>
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<td>is Legally Compliant?</td>
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</table>
I object to this policy as currently worded. A policy to conserve the AONB is welcome but it must be clearer and firmer about restricting any new developments in this area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I OBJECT to the deletion of the following tests that all proposed developments were to be judged against.

- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
- Support the rural economy of the Surrey Hills area
- Provide and maintain public access to the AONB

I also OBJECT to the deletion of ‘protect it from inappropriate development’ in paragraph (1) and the inclusion of paragraph (2). These changes weaken the protection of the AONB.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/3688</th>
<th>Respondent: 8796609 / Rupert Pye</th>
<th>Agent:</th>
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<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I am writing to OBJECT to the overall number of properties scheduled for development in the Guildford 2016 local plan which takes no account of the fact that a substantial part of the Guildford area is covered by the Surrey Hills Area of Outstanding Natural Beauty (AONB). Quite rightly this is not to be developed which means that the same number of proposed properties are to be built on a far smaller area of land than is covered by the total Guildford area. The total number of properties should be reduced to take account of the proportion of land taken by the AONB; as it is, the density of new developments is approximately twice what it should be.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp171/1564</th>
<th>Respondent: 8801761 / A Wright</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P1</td>
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<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
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Protection for the AONB should be strengthened, not weakened. Guildford’s position on the North Downs, with its view of
green fields from the High St., and rich biodiversity, is what makes it so valuable to residents and visitors and must be
preserved. I object to any weakening of the protection. We cannot tell what changes may come in leaving the EC, and
may find that there is less need for housing in the future. If we let the chalk grassland go, or weaken its links, we can
never get it back again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1729  Respondent: 8802241 / Diane Bailey  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I am writing to object most strongly to the changes that have been made in the policy for building and developments in
AONB.

There was previous protection and key tests to be considered for proposals of development, which included conservation
of wildlife, conservation of beauty and views in AONB, to ensure there was support for the rural economy, to provide
public access to AONB. These protections must be kept in place.

Villages in the Surrey Hills have had a great increase in housing numbers in recent years, Gomshall probably more than
most, yet there has been no change in the infrastructure. Public transport has DECREASED, this putting more cars on the
road, the Medical facility is under increasing pressure to cope with many more new residents, there is a shortage of school
places especially from 11 upwards and roads are in appalling condition, and not maintained. There has to be an
infrastructure policy before any new building is approved.

Finally, as before, why not use the many brownfield sites first?

The changes being made from the policy previously put forward are not acceptable and therefore I register my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2355  Respondent: 8806305 / Laurence Cook  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills
Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would
be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2372  Respondent: 8806849 / Roland McKinney  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( No ), is Legally Compliant? ( )

Whilst I agree with this policy, the reality is that the designation of the AONB is being weakened by the development proposals put forward within the Local Plan, specifically the development at Blackwell farm. A large area of this farm should have been placed under the AONB designation, but the review required to do this has left out areas that should have been in the review and slowed down reporting so that the designation has not been given as it should. Nevertheless, the should Blackwell Farm be developed as is proposed, the view from the AONB would be negatively affected, as would the view of the AONB from Guildford.

In addition, the proposed new green belt boundaries include some small areas from AONB - so that these areas of AONB will no longer have green belt protection. Why is this being done? It is wholly unnecessary, and I object to it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5407  Respondent: 8807617 / Anne Heine-Carmichael  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

Behind my house – walking distance is the village of Blackheath. The heath is an area of Outstanding Natural Beauty and of Special Scientific Interest. Is it to become an island amongst suburbia?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17043  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Policy P1 - Surrey Hills Area of Outstanding Natural Beauty**

We are generally content with this policy as it follows the NPPF. Although we would like to see a definition of ‘major developments’ in the Local Plan we are aware that no such definition exists.

However the wording of the paragraph about the AGLV review is misleading and it would be more accurate to say that the boundaries will not be amended until the review is both completed ‘and its conclusions implemented’.

We also suggest that the wording in 4.3.5 which states that ‘all development proposals within and adjacent to the AONB will be expected to conserve or enhance the special qualities’ should be moved and placed within the policy itself.
The wording of Policy P1 only refers to conserving and protecting the views of the AONB whereas Government Policy is very clear that all land that forms the views into, and out of an AONB, should be protected. In its March 2014 Planning Practice Guidance on Natural Environment - Landscape the Government emphasised the importance of protecting the setting of AONBs and National Parks. This affects proposals on land outside an AONB that might adversely affect its setting.

We therefore suggest that the wording of the first bullet point should read ‘conserve and / or enhance the setting of the AONB and the views into, within and out of the AONB’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1230  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are disappointed at the changes that have been made to Policy P1 and that much of the earlier detail has been removed on conservation, public enjoyment, support of the rural economy and public access. This has reduced the impact of this policy and the deleted words in Policy P1(1) should be re-instated.

As we indicated in our July 2016 submission, we are clear that government policy states that all land that forms the views into and out of an AONB should be protected.

We believe this specific provision should be included in Policy P1(3).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6141  Respondent: 8830145 / Peter Smart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan, June 2016

Policy P1

I SUPPORT the Surrey Hills Area of Outstanding Natural Beauty (AONB) being conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development and that there is a presumption against major development in the AONB in accordance with the NPPF.

However I OBJECT to inappropriate exceptions to this policy, such as the proposed “Visitor Centre” at Newlands Corner which has no place imposing itself on the most beautiful scenery in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As the Planning Adviser to the Surrey Hills AONB Board I would like both to support and raise concerns on various AONB aspects of the Plan on behalf of the Board. As I understand to be required at this stage of the Plan’s preparation the concerns are expressed in this document as objections.

1. Summary.

I Support the general avoidance of development allocations involving sites within the Surrey Hills AONB arising from the welcome priority the Council gives to conserving the landscape and scenic beauty of the AONB

1. I Object to the wording of Policy P1 – Surrey Hills AONB as, unintentionally, it would give unclear and weak control over development affecting the AONB and is a retrograde step from the AONB Policy in the Draft Local Plan 2014. Revisions to the policy and supporting text are suggested for it to accord more closely with Government advice and the adopted Core Strategies of 3 of the 4 other Surrey Hills constituent planning authorities and emerging Draft Waverley Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

2. Objection 1 - Policy P1 - Surrey Hills AONB and AGLV.

Policy P1 is considered to lack sufficient guidance to those contemplating development and to the Planning Authority in determining applications. The policy also seems not to comply with the great weight Government policy requires to be given to conserving the landscape and scenic beauty of an AONB. Both of these problems are probably unintentional as it appears that the Council wishes to avoid development within the Surrey Hills AONB. Additionally, the Surrey Hills AONB Board considers there should be consistency in approach to managing development within the AONB amongst its constituent Planning Authorities. Of the 5 District and Borough constituent Planning Authorities, 3 have adopted Core Strategies with similar AONB and AGLV policies. The AONB/AGLV policy in this Guildford Local Plan should equally be similar to those 3 adopted Core Strategies. Lastly, the policy title should include reference to the AGLV as the policy includes reference to the management of development within the AGLV.

The suggested changes below are intended to strengthen and clarify Policy P1 and supporting text and to be more consistent with Government advice and the AONB/AGLV policies in the adopted Core Strategies in 3 of the other 4 constituent Surrey Hills planning authorities. They are also more in line with the emerging AONB/AGLV policy in the Draft Waverley Local Plan to be published in August 2016 which is the last local plan from a Surrey Hills Planning Authority.
The shaded text below is that in the Draft Plan with recommended additions underlined and the location of deletions indicated by words in brackets such as: (delete first sentence in current Draft Plan). As numerous changes are suggested to Policy P1 only the suggested text is set out below without any indication of the deletions and additions.

(Please see attachment for amendments to this policy.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Guildford Local Plan Submission version Board's representation July 2016.pdf (358 KB)

Comment ID: PSLPP16/8171  Respondent: 8830721 / Surrey Hills AONB (Clive Smith)  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. Objection 2 - Longer term harm to the Surrey Hills AONB and AGLV likely to result from the proposed high level of development.

Both the Local Plan and the Sustainability Appraisal have taken the objectively assessed needs housing figure from the Strategic Housing Market Assessment (SHMA) as being the minimum amount of development to be provided for in the Local Plan. Moreover, the Local Plan has built in a buffer through providing for more than this calculated figure derived from the SHMA in case any sites do not come forward for development within the plan period. The Local Plan’s proposal to increase the Borough’s housing stock by 13,860 and population from 137,183 in 2011 to 162,188 in 2033 does not appear to have taken into account the approach set out in Government policy in NPPF paragraph 14 that states that local plans meet this figure unless specific policies (e.g. Green Belt, AONB and flooding policies) indicate development should be restricted.

The relevant part of NPPF paragraph 14 reads as follows.

“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
- any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.”

In the NPPF document the last qualification above relating to specific policies has a footnote listing those specific policies which include as examples AONB, Green Belt and flooding areas that are constraints directly applicable to Guildford Borough. This point was made in the Board’s submission to the draft Local Plan and no Council response can be found that the Council has addressed or rebutted it. In the meantime the Plan appears to conflict with Government policy.

The report of a consultant recognised in the field of SHMAs and acting for the Guildford Residents Association has been seen. The report seems to be an authoritative analysis of the SHMA and indicates that the resultant housing figure is too high. The scaling down of the SHMA housing figure would be very much welcomed from an AONB aspect.

Whilst the only housing site allocation having some effect upon AONB interests is for Blackwell Farm, no consideration seems to have been given to the pressures on the Surrey Hills AONB of such a substantial increase in population over a relatively short period of time and the potential harm this would cause. The Surrey Hills AONB is already subject to immense recreation pressures from residents and visitors that threaten its integrity as a natural landscape and one of scenic beauty. The Surrey Hills AONB is reaching the limit whereby it can take more human interference and still justify being designated a natural landscape of national importance.

The general avoidance in the draft local plan of allocations of land for development in the undeveloped parts of the AONB and AGLV is welcomed and supported. This also accords with the core planning principle set out in NPPF paragraph 17 which states that allocations of land for development should prefer land of lesser environmental value.
The NPPF requires great weight to be given to protecting the AONB within the Borough. The Council is therefore asked to give that same great weight to its responsibility towards the future protection of the Surrey Hills AONB as a national asset in tempering the level of development growth in the local plan. With so much of the Borough subject to restrictive national planning policies, NPPF paragraph 14 gives the Council the justification for not meeting its objectively assessed development needs. This may accord with most of the expressed views of the local communities in the previous draft plan, which if is still the case, would suggest that this level of development does not have local support.

Through providing so much development in this local plan the Council is building up future problems. This is because there would be a substantially higher population and greater numbers of people employed that would generate their own propensity to grow and need further development. Future local plans would then have to cater for even greater pressure for further additional development on a compound basis leading to about a doubling of the Borough’s population by the end of the century. In short, the more this local plan provides for employment development and the population of the Borough to grow, the more development future local plans are likely to have to facilitate. There would be little choice but for the built up areas to extend outwards into protected countryside. From an AONB aspect this will put the Surrey Hills AONB and its setting under greater pressure for development. There has to be a limit to which further development growth can be accommodated all things considered. There is no evidence this has been considered.

Although, the Council may consider its draft local plan meets the needs of the present population, it will compromise the ability of future generations to meet their own quality of life needs. Future generations and businesses will increasingly value the AONB setting of Guildford and enjoyment gained from beautiful landscapes of the Borough offering relief from the stresses of modern life. Consequently, proposing so much development over a relatively short period of time probably does not meet the accepted international definition of sustainable development.

The significant contribution the Surrey Hills AONB makes to people’s quality of life, is not just for the local population but being a national landscape designation, for a much wider and growing population in London and for other visitors.

The Sustainability Appraisal seems merely to have set out to justify the proposed level of growth and has not critically appraised it or even considered that a lower level of growth might be more sustainable. The Appraisal is therefore considered to be flawed and inadequate, and has not properly considered the protected landscape implications of the proposed very high level of growth. A local plan with a more balanced and sustainable approach to development would appear to be more appropriate and the Inspector is asked to refer the plan back to the Council for reconsideration in line with the approach set out in national planning policy set out in NPPF paragraph 14.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
relevance or share similar distinctive landscape characteristics of neighbouring countryside designated as AGLV. It appears therefore this proposal may be a drafting error.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp171/1365</th>
<th>Respondent: 8830721 / Surrey Hills AONB (Clive Smith)</th>
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On behalf of the Surrey Hills AONB Board support is given to the proposed changes to the wording of Policy P1 - Surrey Hills AONB and AGLV and to the proposed changes to the supporting text, including the reasoned justification. Further, support is given that no proposed changes to the Local Plan would have an adverse impact upon the AONB and AGLV.

The Council is thanked for its positive responses to most of the changes the Board suggested to this section of the Local Plan and its recognition of the national importance given to protecting the character of the AONB landscape.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**I OBJECT** because this policy lessens the protection that exists currently whereas I believe most strongly that GBC should be looking to reinforce it. As it is envisaged in the 2016 Draft Local Plan it would seem that any major development in the AONB could be permitted if exceptional circumstances were to be demonstrated. The word 'exceptional' is of course the key here and needs to be urgently defined and clarified by GBC?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty**

**I OBJECT** because this policy lessens the protection that exists currently whereas I believe most strongly that GBC should be looking to reinforce it. As it is envisaged in the 2016 Draft Local Plan it would seem that any major
development in the AONB could be permitted if exceptional circumstances were to be demonstrated. The word ‘exceptional’ is of course the key here and needs to be urgently defined and clarified by GBC?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15762  Respondent: 8836129 / Roger Shapley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan that welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if currently undefined ‘exceptional circumstances’ could be demonstrated.

AONB is the equivalent of a National Park. This policy should contain a statement of support for the Surrey Hills Management Board proposals to bring land previously designated as AGLV into the Surrey Hills AONB, recognising the established land management principles and protections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16922  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Inadequate protection for Protected Sites (SPA, SAC, SSSIs, etc.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16927  Respondent: 8837729 / Harry Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Policy P1 – support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16215  Respondent: 8839041 / Jon Maslin  Agent:
I object to policy P1 Surrey Hills Area of Outstanding National Beauty

This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

‘All proposals will be considered against whether they…’

‘All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities’

Terms such as ‘considered’ and ‘expected’ are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

Of particular concern is the paragraph 3, which begins:

‘Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…’

This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: ‘There is a presumption against major development in the AONB in accordance with NPPF.’

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

‘The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered’

‘Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable’

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/13182  Respondent: 8840449 / David Wilson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty

6.1. The policy should be expanded so that developments that detract from the views from the Surrey Hills are appropriately controlled and minimised. The villages viewable from the Surrey Hills (which include West Horsley, East Horsley and Ockham and Wisley Airfield) should not be included as special areas for additional building sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18179  Respondent: 8843361 / Adrian Atkinson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities.” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” That does this help with apart from acting as an open invitation for development in AONBs - it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

It is highly questionable why Blackwell farm was instructed to be excluded from the AONB boundary review and has been subsequently deemed fit for classification as AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3188  Respondent: 8850433 / Ian Doherty  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Surrey Hills AONB is one of the great treasures of Guildford Borough and we believe that protecting this area should be given the highest priority.

I therefore support Policy P1.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13319</th>
<th>Respondent: 8850945 / Richard Bayes</th>
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**POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (‘AONB’)**

The Surrey Hills AONB is one of the great treasures of Guildford Borough and I believe that protecting this area should be given the highest priority.

I therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8858113 / Ramsey Nagaty</th>
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the GBC Local Plan is more concerned with limiting appeals than protecting and enhancing the areas of AONB. I find it incredible that GBC claim to be protecting the AONB but

a. Propose building roads through the AONB at Blackwell Farm spoiling the iconic view of Guildford and the cathedral rising out of the countryside.

b. I object as I find it suggests predetermination in that the review of AONB which looked to extend AONB status to the whole of Blackwell Farm was binned and the new review excluded Blackwell Farm entirely with Blackwell Farm only being looked at in the review following an independent study of the landscape character commissioned by Parish Councils that clearly showed the AonB compliance of the land at Blackwell Farm..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [RAMSEY NAGATY SPEECH WHY ARE WE HERE.docx](#) (16 KB)

<table>
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I object to Policy P1 Surrey Hills Area of Outstanding National Beauty.
Whilst I welcome the inclusion of a policy to protect the AONB within its submission draft of the Local Plan, I strongly object to Policy P1 and its supporting text, which I consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

Much of our concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

“All proposals will be considered against whether they…”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

This whole opening clause is unnecessary and almost invites development proposals. GGG believes that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

- “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
- “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
- “In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate”

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review and inclusion of areas that were AONB and AGLV and Greenbelt and for unexplained reasons have been excluded despite independent consultants reports showing they should be designated AONB. There is a clear indication of predetermination in that The SCC and GBC appear to have exerted influence for the whole of Blackwell Farm on the Hogs Back to be excluded from the review of AONB such that local Parishes had to employ an independent consultant to undertake a review showing that most of Blackwell Farm should be in the AONB. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2402</th>
<th>Respondent: 8859041 / Chris Lacey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)</td>
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<td>Any attempt to develop AGLV prior to the end of the NE consultation to designate as AONB would be premature</td>
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<th>Comment ID: PSLPP16/2211</th>
<th>Respondent: 8860897 / Julia Shaw</th>
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<td>Attached documents:</td>
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</tbody>
</table>

Policy P1 - Surrey Hills Area of Outstanding Natural Beauty

I object. The policy should strengthen existing protection not weaken it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- Comment ID: PSLPP16/2402
- Respondent: 8859041 / Chris Lacey
- Agent: 
- Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
- Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)
- Any attempt to develop AGLV prior to the end of the NE consultation to designate as AONB would be premature
- What changes (2016)/further amendments (2017) do you suggest should be made to the document?
- Attached documents:

- Comment ID: PSLPP16/2211
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- Agent: 
- Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
- Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? ( )
- I OBJECT to this policy as it stands.
- Whilst I welcome the inclusion of a policy to protect the AONB within its submission draft of the Local Plan, we strongly object to Policy P1 and its supporting text, which I consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.
- Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:
  - “All proposals will be considered against whether they…”
  - “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”
  - Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:
    - “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”
- Attached documents:
This whole opening clause is unnecessary and almost invites development proposals. GGG believes that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

- “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
- “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
- In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17583  Respondent: 8889761 / A Dougherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It should be highlighted that Ripley and the nearby villages lie within the TBHSPA and areas of SSSI and it has been identified previously that significant development within this area would effect the integrity of Special Protection Area and the relevant SSSI and would fail to meet requirements of Regulation 61 of The Conservation of Habitats & Species 2010 as amended nor Regulation 62 so can only dismiss the large scale developments proposed in Ripley & Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1701  Respondent: 8890209 / Jeremy Jane Button  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to object to changes to the policy relating to Surrey Hills AONB that weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable.

This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

I OBJECT to the loss of the five tests which were previously included. Previously it was suggested that all proposals should be considered as to whether they

- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
- Support the rural economy of the Surrey Hills area
- Provide or maintain public access to the AONB

These tests are significant and important and the loss of these tests is a serious diminution of the protection afforded to the AONB. They should be reinstated.

Similarly the deletion of the presumption against inappropriate development means that inappropriate development is not necessarily going to be rejected – which would seem to be in contravention of the policies and the principles of the AONB, which the borough council has a duty to protect. This too should be reinstated.

Please take these objections into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT because this policy lessens the protection that exists currently whereas I believe most strongly that GBC should be looking to reinforce it. As it is envisaged in the 2016 Draft Local Plan it would seem that any major development in the AONB could be permitted if exceptional circumstances were to be demonstrated. The word ‘exceptional’ is of course the key here and needs to be urgently defined and clarified by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8468  Respondent: 8893057 / Dianne Garnett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P1 Surrey Hills and AON

I Object to this policy in that the wording of this does not agree with the national significance of the AONB. Using words like 'considered' and 'expected' suggests erosion of the rules are a possibility. The Draft plan 2014 was worded far more strongly and this area should be safeguarded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16965  Respondent: 8893057 / Dianne Garnett  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 We object to policy P1 Surrey Hills Area of Outstanding National Beauty  1.2  This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

1.3 Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: 1.3.1 “All proposals will be considered against whether they…” 1.3.2 “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

1.4 Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: 1.4.1 “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

1.5 This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

1.6 In addition to the weakness of the language, We are also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a
development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

1.7 We believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:1.7.1 “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”1.7.2 “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”1.7.3 In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

1.8 Finally, we would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1778  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the fact that the five tests below are no longer being considered when proposals are considered in order to protect AONB in the NPPF.

These tests should be reinstated in order to protect the AONB

1. to conserve or enhance views and setting in the AONB
2. to conserve wildlife, historic objects and natural phenomena in the AONB
3. to promote enjoyment by the community and visitors to these areas
4. to support the rural economy specifically in the Surrey Hills area
5. to provide or maintain public access to the AONB

The presumption against inappropriate development NOW means that inappropriate development is not necessarily going to be rejected, This contravenes the principles of the AONB. it is the duty for the borough council to protect this, as development is now rampant compared to what it was with developers now pushing through planning and hoarding land for future development, which would never have been accepted before. The previous presumption of inappropriate development being rejected should be reinstated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14752  Respondent: 8896161 / Carol Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY P1: Surrey Hills Area of Outstanding Natural Beauty

The policy should be expanded so that developments that detract from the views from the Surrey Hills are appropriately controlled and minimised. The villages viewable from the Surrey Hills (which include West Horsley, East Horsley and Ockham and Wisley Airfield) should not be included as special areas for additional building sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It does not protect the Surrey Hills Area. GBC are weakening its protection with potential development if developers can prove 'exceptional circumstances'. I **object to P1.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9449  **Respondent:** 8915073 / Alastair Lawson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Protection means protection no matter which accreditation an area has and the rules including distances need to be followed. All the ANOB should remain protected from development. And Blackwell Farm needs to be recognised as ANOB too.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16203  **Respondent:** 8916161 / Margot Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The Council has a legal obligation to take into account the habitats within the GBC area. These were described in detail in 2013 in my response to the Local Plan "Question 29 - Land in & around Chilworth". The response has the reference number above, and was accepted by GBC on 9/12/2013. In summary GBC greenbelt has four key habitats: lowland heathland - the rarest habitat in the world, chalk grassland, ancient woodlands and the cleanest river in Surrey. In the documentation the Council recognises the need to build within town & village boundaries rather than on this unique and internationally important greenbelt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3524  **Respondent:** 8919521 / Susan Hughes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty** OBJECT. This policy weakens the protection afforded to the Surrey Hills. It even leaves open the very real threat of future development in the area at the Council's discretion using the undefined "exceptional circumstances" clause.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object that the AONB areas are excluded from taking a proportion of new housing developments. Large developments are inappropriate but these areas should provide homes for local people and their families. Policies H2 and H3 should apply throughout the borough, including AONB, but proportionate and sympathetic to each location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I support a policy that will protect the Surrey Hills Area of Outstanding Natural Beauty.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/16038</th>
<th>Respondent: 8941761 / FLGCA (Paul Kassell)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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The wording of this phrase cases great concern, if we desire to protect the Area of Outstanding Natural Beauty. Firstly, if the plan starts with a presumption in favour of development, surely this policy could start with a presumption against development in the AONB. The wording lower down in the policy does not offer the same prominence and qualifies with the word “major”

Additionally consider the phrase “All proposals will be considered against whether they

- conserve and/or enhance the setting and views of the AONB
- conserve wildlife, historic objects or natural phenomena within it
- promote its enjoyment by the community and visitors to the area
- support the rural economy of the Surrey Hills area
- provide or maintain public access to the AONB”

Surely this would be better worded as “Developments that do not……will not be granted planning permission.”?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp171/1301</th>
<th>Respondent: 8947457 / Gerry Armstrong</th>
<th>Agent:</th>
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I object to the weakening of the AONB protection in Policy P1. There appears to be no restrictions on non-major development. This is unacceptable; the 5 key tests should be maintained in this Policy. Development in these areas removes the choice from residents who wish to enjoy natural beauty, ancient woodland, natural habitats and associated wildlife all of which are under stress from urbanisation and encroaching development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/9367</th>
<th>Respondent: 8948385 / Gillian Eve</th>
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Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

I OBJECT. This policy weakens existing protection when it should strengthen it. The wording is too loose; terms such as "considered" and "expected" are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16154  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy allows potential development outside settlements even in Green Belt and includes wording to propose extension of this policy for market housing. The policy wording should explicitly limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/377  Respondent: 8956481 / A J Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

AONB

The paragraphs relating to AONB weaken the protection of AONB. The previous restrictions on non major developments have been removed. The five key tests previously applied seem to have given way to a more relaxed attitude to applications affecting AONBs. I object to these changes to Policies P1 and E5.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17298  Respondent: 8967233 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Luke Vallins)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The University broadly supports this policy. The University notes that the allocation in Policy A26 at land at Blackwell Farm for a mixed use urban extension includes a small area of land that is located within the AONB.
The University confirms that its proposals for this land do not include new buildings within the AONB boundary, although the proposed new site access from the A31 (which is itself already within the AONB) will inevitably pass through the AONB. This is included within the site allocation at Policy A26. The University will ensure, working with the planning and highway authorities, that this access will be created sensitively in line with the policy.

The University notes that the policy also covers the Area of Great Landscape Value (AGLV), and that the land allocated for development at Blackwell Farm under Policy A26 includes a small area of land currently designated as AGLV. It is also noted that policy P1 states in the 4th paragraph that the AGLV will be retained until such time as there has been a review of the AONB boundary.

Whilst it is accepted that the AONB boundary, as a national designation enshrined in law, can only be changed following the procedures set out in the relevant legislation, the AGLV is a local designation that can be changed by the local planning authority through the plan process. We also understand that the part of the AGLV that is within the A26 site allocation is not included in the proposed ‘candidate areas’ submitted to Natural England for consideration under the AONB boundary variation process.

Hence the AGLV designation should be removed from the allocated land and this should be reflected on the Policies map.

It is unlikely that the outcome of the AONB boundary review would seek to extend the AONB boundary onto land allocated for development in a local plan or draft local plan, and it is not certain that the AONB review will actually be completed.

The University considers that the local plan should include safeguarded land where the green belt boundary has been altered to provide flexibility for longer term development needs and to prevent the need to revisit the green belt boundary again in a future local plan review. It has put forward additional land in its ownership at Blackwell Farm, adjacent to land allocated in Policy A26, that is suitable, available and deliverable to help provide for the borough’s future development needs and that should be identified as safeguarded land. The University notes that this additional land is outside the AONB but parts of it lie within the currently identified AGLV. Again, the AGLV should be removed from this safeguarded land and this should be reflected in an update to the Policies map.

**Paragraphs 4.3.7 – 4.3.8**

As noted in connection with Policy P1, the University sees no reason why the AGLV cannot be removed in advance of the AONB boundary review, and considers that an updated Policies map should be produced to reflect this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There will be a presumption against major development in the AONB. Proposals within the AGLV will be required to demonstrate that they would not result in harm to the AONB or to the distinctive character of the AGLV itself.

Reasoned Justification

- Paragraph 115 of the NPPF makes it clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. Any and all development proposals within and adjacent to the AONB will be expected to conserve and enhance its special qualities.

- Paragraph 116 states that planning permission should be refused for major developments in these designated areas unless exceptional circumstances are confirmed.

- No change will be made to AGLV status pending completion by Natural England of its review of the AONB boundary. The role that the AGLV plays in protecting this nationally important countryside should then be confirmed and its importance in maintaining landscape character and quality recognised both within and outside the AONB.

- The policies outlined in the Surrey Hills AONB Management plan apply not only to Guildford but to all relevant districts and boroughs across the county. This document is a key tool in the decision-making process regarding AONB and AGLV countryside. The management plan is also an important material consideration in determining planning applications within and adjacent to the AONB.

"POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) and of Great Landscape Value (AGLV)

- The Surrey Hills AONB is countryside of national importance and has equal statutory protection to a National Park. The whole of the AONB is classified as an Area of Great Landscape Value (AGLV) and this extends beyond the AONB boundary with the objective of protecting its distinctive landscape character. AONBs were originally identified via the National Parks and Access to the Countryside Act 1949, with the primary purpose to conserve the natural beauty of the landscape.

- The Surrey Hills offers some of the most beautiful and accessible countryside in England. The North Downs National Trail runs along their length and is characterised by its important views across distinctive landscape which includes chalk grassland, woodland, heaths, commons and agriculture. An important objective of planning is to conserve and enhance the natural setting of the AONB and to protect its unspoilt character and tranquility.

- Dark skies at night and the lack of air pollution and noise disturbance are for example a feature of the Surrey Hills countryside at the Devil's Punchbowl near Hindhead since the A3 tunnel with its traffic has gone underground. Protecting a sense of remoteness and natural beauty in the landscape should be reinforced in all parts of the Surrey Hills AONB within Guildford.

- Natural England are scheduled to make a review of the AONB boundary with the intention of extending the size of the Surrey Hills AONB. While the AGLV has acted as a buffer to the AONB, it also has its own inherent landscape quality which contributes to the rural environment in its own right and preserves views from and into the AONB. It should continue to provide long standing protection across the county to important countryside and is to be considered equivalent in quality to the AONB.

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

The Surrey Hills AONB is countryside of national importance and should therefore be provided with the highest level of protection. The draft policy needs to be strengthened so that it includes a more robust defence of natural beauty which must be conserved and enhanced.

We have decided to express our objection to Policy P1 by suggesting the following alternative wording which we believe would be more readily acceptable:
### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13121</th>
<th>Respondent: 8993121 / Shelagh Yeomans</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

**Policy P1: Surrey Hills Area of Outstanding Natural Beauty**

**I OBJECT to this policy**

Whilst the inclusion of a policy to protect the AONB within its submission draft of the Local Plan is welcome I strongly object to Policy P1 and its supporting text, which I consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8669</th>
<th>Respondent: 9050337 / Nigel Geary</th>
<th>Agent:</th>
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<tr>
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</tbody>
</table>

The Surrey Hills AONB is one of the great treasures of Guildford Borough and we believe that protecting this area should be given the highest priority.

I therefore support Policy P1.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11428</th>
<th>Respondent: 9062913 / Susan Parker</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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**POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty**

**OBJECT** This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1845  Respondent: 9062913 / Susan Parker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy relating to Surrey Hills AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable.

This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

I OBJECT to the loss of the five tests which were previously included. Previously it was suggested that all proposals should be considered as to whether they

- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
- Support the rural economy of the Surrey Hills area
- Provide or maintain public access to the AONB

These tests are significant and important and the loss of these tests is a serious diminution of the protection afforded to the AONB. They should be reinstated.

Similarly the deletion of the presumption against inappropriate development means that inappropriate development is not necessarily going to be rejected – which would seem to be in contravention of the policies and the principles of the AONB, which the borough council has a duty to protect. This too should be reinstated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18555  Respondent: 9079393 / Wisley Property Investments Ltd.  Agent: Savills (Charles Collins)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P1: Surrey Hills AONB

Support (Sound)

WPI supports the ongoing protection for the Surrey Hills AONB. The allocation of new land for development outside of the AONB has ensured this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Policy/ Section / page / para** | **Original Changes requested (July 2016 Representation)** | **Understanding of changes shown in the Focused Amendments (June 2017)** | **WPI Comments (Updated Representation)**
--- | --- | --- | ---
Policy P1: AONB Page 47 | WPI supports the draft policy. | (page 52) General changes have been made to the policy, including additional reference to “Area of Great Landscape Value”. | General changes to the policy are noted. **Continued support.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2750  **Respondent:** 9079393 / Wisley Property Investments Ltd.  **Agent:** Savills (Jim Beavan)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

<table>
<thead>
<tr>
<th>Policy/ Section / page / para</th>
<th>Original Changes requested (July 2016 Representation)</th>
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<th>WPI Comments (Updated Representation)</th>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1655  **Respondent:** 9319777 / Mark Seligman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write in relation to the current consultation on the above, and in particular Policy P1.

I am very concerned about a reduction in the protection awarded to the Surrey Hills Area of Outstanding Natural Beauty (AONB). This would become dependent on the Surrey Hills Management Plan. This welcomes housing development.

I do not believe housing development should be allowed in the Surrey Hills AONB except in the case of exceptional circumstances. Such exceptional circumstances should be carefully defined.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1655  **Respondent:** 9319777 / Mark Seligman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I write to object to the weakening of the protection against non-major development in an AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/14942  **Respondent:** 9327009 / sp2 Consulting Limited (Stephen Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1638  **Respondent:** 9332193 / Save the Hogs Back Campaign  **Agent:** Green Balance

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

65. Save Hogs Back welcomes the proposed changes to Policy P1. In particular we support the more positive approach to sustaining AONB qualities and the greater attention given to protecting the setting of the AONB in paragraphs (3) and (5). We also particularly welcome the retention of the AGLV designation in the manner set out in paragraph (5).

66. We also welcome the updated clarification of the status of Areas of Great Landscape Value in paragraph 4.3.8 of the Reasoned Justification.

67. Unfortunately, the policy (particularly as amended) is not always applied through the Plan as a whole. The strategic allocation of land for housing in Policy A26 at Blackwell Farm is in direct conflict with Policy P1 as amended and is the most significant proposed release of a greenfield site that has major adverse impacts on the AONB. A small part of the allocation is also included within the AGLV. The Blackwell Farm site allocation conflicts with Policy P1 and should be removed from the Plan.

68. The proposal in Policy A26 would in summary involve:

- constructing major development in the form of a significant new access road to the Blackwell Farm development and the extended Research Park, by crossing the AONB down the steep northern face of the Hog’s Back, causing immense damage to the AONB (and increasing the impact of the development on those passing through the AONB);
- major development in the immediate setting of the AONB, in an area which (apart from some University expansion) has been relatively little-damaged to date;
- taking land for major development which ought to be included within the AONB and has a real prospect of being so included following the Surrey Hills AONB boundary review to be carried out by Natural England (paragraph 4.3.8 of the Plan refers): an independent landscape consultancy working for Compton and
Worplesdon Parish Councils applied the AONB boundary evaluation methodology in detail, recommending that Down Place and much of Blackwell Farm should also be designated as AONB.

More information on the impact of Policy A26 on the AONB was set out in section 3 of our submission in 2016.

69. We consider that the monitoring arrangements for Policy P1 are unwise as they are limited to the outcomes of appeals, over which the authority has no control. The measure is also pointless: we doubt that the Council is really saying that it would change its policy on protecting a nationally important landscape if a few Inspectors made different judgements (how many, how often?) about the application of the policy in particular cases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10635  Respondent: 9335041 / David Reeve  Agent: 9335041 / David Reeve

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P1: Surrey Hills Area of Outstanding Natural Beauty

I OBJECT to this policy on the following grounds:

NPPF paragraph 154 states that “Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.” Policy P1 as currently drafted is far too loose to provide a decision maker with effective guidance on how to react to a planning application, and it must be amended to make it far more prescriptive. Moreover, in important respects it is considerably weaker than the equivalent policy in the 2003 Local Plan; specifically there is no guidance as regards the relative weight that should be attached to the provisions of the current Surrey Hills AONB Management Plan as opposed to the bulleted points in the policy.

In addition, it is insufficient to state simply that “The AGLV will be retained until such time as there has been a review of the AONB boundary. Proposals within the AGLV will be required to demonstrate that they would not result in harm to the AONB or the distinctive character of the AGLV itself”. For the sake of argument, what would happen to areas of AGLV, if the AONB review was undertaken and led to no change at all to the present boundary? All that is said at present is that “the landscape character of the countryside remaining outside the AONB boundary will be protected and enhanced through criteria based policies, and if appropriate, local designations included within the Development Management Policies DPD” . This Local Plan is supposed to set out the policies that will prevail throughout the Plan period; it is not acceptable to simply defer consideration of this issue until some unspecified time in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2631  Respondent: 9335041 / David Reeve  Agent: 9335041 / David Reeve

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT (on 3 distinct grounds)

1. I object to the proposed removal of the five bulleted items under paragraph 1 of the Policy.
2. I object to the proposed removal of the final sentence paragraph 4 of the Policy, ie. “Exceptions may only be made for proposals that meet both criteria specified in paragraph 116 of the NPPF”.

3. I object to the deletions in paragraph 4.3.6.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8217  **Respondent:** 10662849 / Garry Walton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/644  **Respondent:** 10717985 / Alison Drennan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I object to the reclassification of an AONB to AGLV, it affords less protection and goes against the views of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Leave the AONB with their current designation.

Attached documents:

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Comment ID: PSLPP16/853  **Respondent:** 10798049 / Steve & Maureen Knight  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Support in principle but Hogs Back beauty should be preserved

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/329</th>
<th>Respondent: 10799169 / Neal Basson</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</th>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<tr>
<td>POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty</td>
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<tr>
<th>Comment ID: PSLPP16/18375</th>
<th>Respondent: 10799169 / Neal Basson</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</th>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<th>Comment ID: pslp171/502</th>
<th>Respondent: 10799169 / Neal Basson</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1</th>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<table>
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<tr>
<th>Comment ID: PSLPP16/17524</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</th>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
</tr>
</thead>
</table>
We object to Policy P1 Surrey Hills Area of Outstanding National Beauty

Whilst the Guildford Greenbelt Group welcomes the inclusion of a policy to protect the AONB within its submission draft of the Local Plan, we strongly object to Policy P1 and its supporting text, which we consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

Much of our concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

“All proposals will be considered against whether they…”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

This whole opening clause is unnecessary and almost invites development proposals. GGG believes that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, GGG is also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

GGG believes that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

• “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
• “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
• In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, GGG would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. We consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

It has been noted that CPRE have proposed alternative wording for the AONB Policy 1 in their own submission, and this wording would be a more appropriate protection for the AONB than that offered in this current policy wording.

As this stands, the wording is far too weak and does not comply with the requirements of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
 OBJECT  This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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 Surrey Hills proposals

No to re-assessment of the village boundaries, no to development proposals outside the settlement areas all within an area classed as Outstanding Natural Beauty!

This is precious countryside valued for its beauty and wildlife that we all enjoy for our recreation.

Lastly I would like to know where are all the new home owners are going to work as I do not believe there are sufficient employment opportunities locally to support these radical plans and therefore travel will be required. As previously mentioned a greater demand on already overstretched services such as schools, healthcare, hospitals etc would be required. I already have to wait two or more weeks to see my GP.

Where is the evidence that all these homes are absolutely necessary and will the developers properties be affordable? I believe it is essential to identify brown field sites, largely in the urban areas first, either available now, or which could become available in the future plan term and what their capacity is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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 Loss of valuable agriculture land and countryside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

- This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 **I object** to policy P1 “Surrey Hills Area of Outstanding National Beauty” on the grounds that;

1.2 This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

1.3 The wording of the Policy is unduly loose, which in some places renders the policy ineffective, for example: “All proposals will be **considered** against whether they...” “All development proposals within and adjacent to the AONB will be **expected** to conserve or enhance its special qualities”

1.4 Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

1.5 This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

1.6 In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, i.e. landscape character, scenic beauty, important views, tranquillity etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

1.7 I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Surrey Hills needs much more substantial protection. Even major development in the AONB would be permitted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1721  Respondent: 10857889 / William Kyte OBE  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy relating to Surrey Hills AONB weakens the protections offered, and, unlike in previous drafts, does not have restrictions on non-major development. Previously all proposals were considered against the 5 key tests – now development in the AONB has been made more acceptable.

The changes do not include the government policy that views into and out of an AONB should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18591  Respondent: 10858977 / Angela Otterson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P1 Surrey Hills Area of Outstanding National Beauty

This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

- “All proposals will be considered against whether they…”
- “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

Of particular concern is the paragraph 3, which begins:

- “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”
In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

- “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
- “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
- In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16012  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P1 AONB

I object to policy P1 Surrey Hills Area of Outstanding National Beauty

This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:“All proposals will be considered against whether they…”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”
This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

“The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”

“Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/ or AGLV may be necessary and deemed appropriate.

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Surrey Hills AONB is one of the great treasures of Guildford Borough and we believe that protecting this area should be given the highest priority.

We therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2247  Respondent: 10914721 / Taj Gilligan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The proposal to remove the Horsleys from the Green Belt requires special circumstances. These have not been demonstrated.

Reasons for - what looks to be increasing the land available for future development - the extension of the boundaries of the settlement areas of the Horsleys are unsound.

The development of over 2000 houses at Wisley Airfield in Ockham would have the most devastating impact on the Horsley Villages, who are already struggling with a lack of infrastructure (such as schools, transportation, doctors and parking). Any new infrastructure proposed will not sustain the increase in traffic, let alone the pollution caused and lack of flood management in an area with thousands of already-unmanaged underground springs.

There are already huge traffic challenges in the Horsley villages. This would be heavily compounded by development of the Bell & Colvill site on the A246, East Lane, West Horsley, Thatchers Hotel site, and Ockham Road North. The last of these is in the centre of the lower village, which can hardly cope with too much traffic, a lack of parking and overcrowded public transportation.

The increase of up to 35% of new houses proposed for West Horsley is excessive for a rural area which has great historic significance. The impact on roads, schools, medical facilities, public transport and the environment would be devastating to the general area and detrimental to all residents.

In the long term, with development as has been proposed, the Horsleys and surrounding areas will become places to be avoided at all costs due to gridlock, flooding, pollution and lack of services. Ockham Road already suffers with oversized lorries using it as a means of getting to the A3, which makes it dangerous for other drivers and any pedestrian that dares to walk along the narrow footpath beside it. Bicycles easily block this narrow road, which is also used by drivers going well over the speed limit. Too much is being sacrificed to meet government objectives, which should be urgently reviewed and amended after the Brexit vote.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7209  Respondent: 10915361 / Judy Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty
I OBJECT to the policy which is weak and does not offer sufficient protection for this area of outstanding beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14768  Respondent: 10920129 / Steven Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Surrey Hills Area of Outstanding Natural Beauty OBJECT. The vague, undefined "exceptional circumstances" clause will allow the Council to develop in the Surrey Hills Area in the future. This indeed weakens the protection currently afforded to the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3408  Respondent: 10927137 / Mary Pargeter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The development is out of scale and proportion with this rural and agricultural environment and would impact greatly on the character of the local hamlets of Ockham and Hatchford.

The Local Plan poses a threat to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

The proposed plan does not have the support the local community and is in opposition to Government advice that the local plan should have that support and that demand for housing alone will not change the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1705  Respondent: 10933793 / Julia Tilbury  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P1 - Surrey Hills Area of Outstanding Natural Beauty
I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1677  Respondent: 10933857 / C J Tilbury  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P1 - Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15362  Respondent: 10935201 / Cathryn Walton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8656  Respondent: 10951777 / Jackie Turner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In addition, the new land evaluation study, carried out by Land Management Services, an established firm of landscape architects, assessed the area using Natural England’s latest AONB criteria and found that nearly the whole of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.
The study also recommended that adjoining “semi rural” areas on the western edge of Guildford, which did not meet AONB criteria, should remain undeveloped as they provided an important setting to the AONB.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<td>I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty because this policy is insufficient and is a dilution of the former policy. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. The Surrey Hills needs much more substantial protection.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>I object to POLICY P1 and POLICY E5 I am very disappointed that GBC now wishes to weaken the protections offered with their new policy relating to AONB, and remove restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now it appears that the intention is to support development in the AONB. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Respondent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<tr>
<td>Surrey Hills Area of Outstanding Natural Beauty – I OBJECT. This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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AONB – POLICY P1 and POLICY E5

The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Loss of locally and nationally important views

1. The chalk ridge of the Hogsback provides important views of the local area – and in particular the Surrey Hills Area of National Beauty. The reason for this designation was its local importance. Including a significant swathe of this in the local plan for development would dramatically impact these views and the views of Guildford cathedral.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy P1 - Surrey Hills Area of Outstanding Natural Beauty

I object. The policy should strengthen existing protection not weaken it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am writing to express my total dissatisfaction with the proposed local plan. On many fronts it is in breach of regulations and facts have been misrepresented by GBC. Here are my main objections. I am not able to express them in legal terms but these are the feelings of 90% or greater of the two villages of East and West Horsley. The Surrey Hills AONB is one of the great treasures of Guildford Borough and I strongly believe that protecting this area should be given the highest priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We strongly support the protection of all Areas of Outstanding Natural Beauty and oppose any changes and development that may erode the character of AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:“All proposals will be considered against whether they….”“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities.”Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides
public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”. In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate. Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14582  Respondent: 11036801 / Judith Mercer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

By the use of loose wording this policy has weakened the protection of the AONB rather than strengthening it! I object to the policy being dependant on the provisions of the Surrey Hills Management Plan, which apparently welcomes housing development and who knows, might agree to all sorts of development, now or in the future.

The policy states "Development proposals will be assessed against the provisions of the current Surrey Hills AONB Management Plan ". Why?

Any development proposals should be assessed surely against the strict criteria of the National legislation NPPF which sets the policy, and which the AONB Board follows, but then sets its own aims which are not properly scrutinised or regulated. The NPPF is the higher authority here and should be referred to within Policy P1, rather than a flimsy nod to Surrey Hills Management.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1516  Respondent: 11036801 / Judith Mercer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P1 (Surrey Hills Area of Outstanding Natural Beauty)

Although the policy wording has been significantly amended, I object to Policy P1. The policy weakens the protections offered and unlike previously does not have restrictions on non-major development. This policy therefore is going in the wrong direction. Previously all proposals were considered against the 5 key tests, but now development in the AONB is being made more acceptable. I object to the weaker not stronger protection. It is also contrary to the huge response from
the public and the weight of protection in the NPPF. The government guidance for Planning Practice published 21.1.16, from the Department for Communities and Local government states that “The Framework is clear that great weight should be given to conserving landscape and scenic beauty in these designated areas irrespective of whether the policy in paragraph 116 is applicable.” Para 005refID 8-005-20140306. In other words, that should include any proposals of any kind for development including non major. I would like the Council to make certain it includes wording in Policy P1 which states exactly the words in that guidance.

4. Policy A36-A41 East and West Horsley I object to the changes to Policies A36-A41 (East and West Horsley). The potential development sites have been reduced by two (A36 and A41) representing 138 dwellings. This leaves 4 sites which still represent 395 new dwellings. I object to all of these 4 sites remaining for the following reasons:

- they collectively represent in absolute terms, overdevelopment in East and West Horsley and in relation to the rest of the borough this is disproportionate. The many objections from residents have not been heeded, and the imbalance has not been corrected.
- no “exceptional circumstances” or any justification has been given in the plan for this unaccountable imbalance where 70% of all new development in the borough is to be on Green Belt sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16463  Respondent: 11037217 / Bo Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policies P1 Surrey Hills Area of Outstanding Natural Beauty (AONB), P2 Green Belt and the Countryside - OBJECT:

- Policy P2 states “We will continue to protect the Metropolitan Green Belt against inappropriate development.” I fully object to this statement and this cannot be further from the truth as thousands of homes have been earmarked for greenbelt land.
- I object to the removal of villages (including my home in West Horsley) from the greenbelt by insetting and extending the 2003 Local Plan Settlement Area boundaries. The greenbelt was established to prevent merging of villages and urban sprawl, and by removing tens of villages across the borough from the greenbelt, you are allowing this sprawl to take place.
- No exceptional circumstances have been provided to confirm the need for building on the greenbelt.
- West Horsley and the surrounding villages of East Horsley and Ockham are ones of a rich and varied mix of well established low housing density settlements with a considerable number of historic buildings. Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors (walkers and cyclists) through the seasons each year. I object to the significant number of new housing proposed for this area as you will damage the charm and rural setting of these villages beyond repair.
- The Key Evidence document “Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West Horsley and the neighbouring villages.
- There are no real plans for increased employment through the proposed development in West Horsley with proposed economic development sites on the opposite side of the borough to West Horsley, making it unlikely that they will be supporting any new developments here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td><strong>I object</strong> to this policy as I am concerned it weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. The policy should be tightened up.</td>
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<td><strong>Noted that Policy P1 (1) has been reduced but there is a new Policy P1 (3)</strong></td>
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<td><strong>4.3.8 Welcome further information on the AGLV review.</strong></td>
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<td><strong>• P1 and E5 have removed the 5 tests for development in the AONB, making it more vulnerable to development, in contradiction to government policy and promises made by the council leadership since the 2016 consultation.</strong></td>
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<td><strong>I object</strong> to this policy as I am concerned it weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. The policy should be tightened up.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2373  Respondent: 11071553 / Nicholas Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• P1 and E5 have removed the 5 tests for development in the AONB, making it more vulnerable to development, in contradiction to government policy and promises made by the council leadership since the 2016 consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14313  Respondent: 11080097 / David & Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they…” “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered.” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable.” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and or AGLV may be necessary and deemed appropriate. Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16876  Respondent: 1119265 / Guildford Environmental Forum (Raymond Smith)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Whilst there are good aspects of the Proposed Submission Local Plan: strategy and sites 2016 we consider it to be deeply flawed in critical areas, detailed below. Since so much of the Plan flows from these flawed origins we are not commenting on the detail of the Plan.

We consider the Draft Local Plan is unsound since it fails to recognise the constraints placed on the objectively assessed needs for housing by the Green Belt. It is quite clear in the government guidance on the NPPF that objectively assessed needs are constrained by designations such as the Green Belt.

“The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt,.....”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2540  Respondent: 11199841 / Woodstreet Village Association (Neville Byran)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We see the amendments, but this appears to weaken the AONB protection. We maintain the requirement of this policy is to fully consider the AONB build policy against eh 5 key tests.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17210  Respondent: 11832961 / The National Trust - London and SE (Rachel Botcherby)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The National Trust own and manage approximately 3932.71 ha of land designated within the Surrey Hills AONB. The distinctive character and natural beauty of Areas of Outstanding Natural Beauty (AONBs) make them some of the most
special and loved places in England, which is why the National Trust will continue to champion for the ongoing protection and enhancement of the Countries protected landscapes.

The NPPF (Paragraph 115) makes it clear that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty”.

The landscape and natural environment of Guildford is one of its greatest assets which should be protected and enhanced through local plan policy. We are concerned about the wording of Policy P1 and the strength of protection such wording will deliver in practice. No specific mention has been made to the ‘Great Weight’ that government policy requires, which we consider needs to be made explicit in any Local Plan policy.

We do not consider that the criteria set out in the draft policy are particularly robust and consider that the policy could be reworded to more closely reflect the policies in the AONB Management Plan and deliver a more consistent policy approach to that taken within neighbouring authorities with adopted local plan policies, who also manage development within the AONB/ AGLV.

Activities and developments outside the boundaries of AONBs that have an impact within the designated area are also covered by the statutory ‘duty of regard’, therefore, the draft policy should be amended to make it explicit that development that would adversely impact the setting of the AONB, through either harm to public views into and from the AONB or by some other impact, will not be permitted.

Whilst we acknowledge that Natural England are to undertake a review of the AONB boundary, much of the Areas of Great Landscape Value (AGLV) are identified as Surrey AONB Candidate Areas, therefore, the same policy principles should apply to AGLV as to AONB until such time as the review has been undertaken. Areas of Great landscape Value are an incredibly important buffer to the AONB as well as having their own high quality landscape character and the National Trust do not wish to see such protections undermined.

See additional comments below in relation to Policy A26 Blackwell Farm, Hogs Back, Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2434  Respondent: 14177313 / Ian Macpherson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 51 – Policy P1 – AGLV

Pleased to see the presently ambiguous status of AGLV being addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4751  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
12 POLICY P1 AONB

12.1 I object to policy P1 Surrey Hills Area of Outstanding National Beauty

12.2 This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

12.3 Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

12.3.1 “All proposals will be considered against whether they…”

12.3.2 “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

12.4 Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:

12.4.1 “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

12.5 This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

12.6 In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

12.7 I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

12.7.1 “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”

12.7.2 “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”

12.7.3 In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

12.8 Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)</td>
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<td>5.14 We are supportive of the policy that the designation of AONB does not preclude specific types of development and that proposals will be assessed on their individual merits. We have concern over the continued reliance on the AGLV given that policy has moved towards landscape characterisation and assessment rather than local level designations. The AGLV in particular should not prevent development that is otherwise sustainable and in the interests of the Local Plan. In particular the land at Onslow Park should be removed from the AGLV since it was remodelled as part of the golf course redevelopment in recent years and is isolated from other parts of the designation with clear boundaries to the AONB.</td>
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<td>I agree the policy of protecting the green belt</td>
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<td>I am writing to object, in the strongest terms, to the above mentioned plan for the following reasons:</td>
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<td>- Policies P1 &amp; P2 are clearly at odds with your policy of protecting the Metro Greenbelt and AONB from inappropriate development.</td>
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POLICY P1 - Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1990  Respondent: 15245313 / C.A. Lindsay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Areas of Outstanding National Beauty – P1 and E5

The protection afforded to AONB’s appears to be weaker now as it does not have restrictions on non-major development. It is contrary to the huge responses from the public in previous consultations. I object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1801  Respondent: 15247265 / Aileen Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. PROTECTING POLICIES

This section in the Proposed Submission Local Plan sets out policies concerned with protecting the environment across Guildford Borough, including the Metropolitan Green Belt.

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (‘AONB’)

The Surrey Hills AONB is one of the great treasures of Guildford Borough and I believe that protecting this area should be given the highest priority.

I therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1825  Respondent: 15247745 / Brian Aitcheson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
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POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (‘AONB’)

The Surrey Hills AONB is one of the great treasures of Guildford Borough and I believe that protecting this area should be given the highest priority.

I therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Many of our concerns stem from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they…” “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities.” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. We believe that it should be deleted, and the sentence should begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

We are also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. We believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate. Finally, we would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review.

This should include Blackwell Farm which was recently reviewed by an Independent consultant (annex 1) and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)

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Comment ID: pslp171/1036  
Respondent: 15275009 / Compton Parish Council (Fiona Curtis)  
Agent: Green Balance

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

65. Save Hogs Back welcomes the proposed changes to Policy P1. In particular we support the more positive approach to sustaining AONB qualities and the greater attention given to protecting the setting of the AONB in paragraphs (3) and (5). We also particularly welcome the retention of the AGLV designation in the manner set out in paragraph (5).

66. We also welcome the updated clarification of the status of Areas of Great Landscape Value in paragraph 4.3.8 of the Reasoned Justification.

67. Unfortunately, the policy (particularly as amended) is not always applied through the Plan as a whole. The strategic allocation of land for housing in Policy A26 at Blackwell Farm is in direct conflict with Policy P1 as amended and is the most significant proposed release of a greenfield site that has major adverse impacts on the AONB. A small part of the
allocation is also included within the AGLV. The Blackwell Farm site allocation conflicts with Policy P1 and should be removed from the Plan.

68. The proposal in Policy A26 would in summary involve:

– constructing major development in the form of a significant new access road to the Blackwell Farm development and the extended Research Park, by crossing the AONB down the steep northern face of the Hog’s Back, causing immense damage to the AONB (and increasing the impact of the development on those passing through the AONB);
– major development in the immediate setting of the AONB, in an area which (apart from some University expansion) has been relatively little-damaged to date;
– taking land for major development which ought to be included within the AONB and has a real prospect of being so included following the Surrey Hills AONB boundary review to be carried out by Natural England (paragraph 4.3.8 of the Plan refers): an independent landscape consultancy working for Compton and Worplesdon Parish Councils applied the AONB boundary evaluation methodology in detail, recommending that Down Place and much of Blackwell Farm should also be designated as AONB.

More information on the impact of Policy A26 on the AONB was set out in section 3 of our submission in 2016.

69. We consider that the monitoring arrangements for Policy P1 are unwise as they are limited to the outcomes of appeals, over which the authority has no control. The measure is also pointless: we doubt that the Council is really saying that it would change its policy on protecting a nationally important landscape if a few Inspectors made different judgements (how many, how often?) about the application of the policy in particular cases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The village of Normandy lies within an area of outstanding natural beauty close to the Surrey Hills to the South and the Army Heath land to the North. It provides a welcome rural break between the towns of Aldershot and Guildford, and is in designated Green Belt. It features a wide range of wild life, including many endangered and protected species, and the addition of 1,100 households, with their associated cats, would decimate much of the wild life that lives here. In addition, the replacement of the present agricultural land with housing would remove a valuable habitat for all the wild creatures that have come to rely on the peaceful nature of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>PSLPP16/2790</td>
<td>15298849 / Elaine Burns</td>
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PROTECTING POLICIES

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (‘AONB’)

The Surrey Hills AONB is one of the great treasures of Guildford Borough and I believe that protecting this area should be given the highest priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>PSLPP16/14211</td>
<td>15299201 / Samira Abdullah</td>
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I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:“All proposals will be considered against whether they…”“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character,
scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate. Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2824</th>
<th>Respondent: 15299425 / Tim and June Yorath</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

We object to this policy as we are concerned it policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. It should be tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2881</th>
<th>Respondent: 15301089 / Brian Yeomans</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tr>
</tbody>
</table>

Policy P1: Surrey Hills Area of Outstanding Natural Beauty

I OBJECT to this policy

Whilst the inclusion of a policy to protect the AONB within its submission draft of the Local Plan is welcome I strongly object to Policy P1 and its supporting text, which I consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3434</th>
<th>Respondent: 15320737 / Steven Brown</th>
<th>Agent:</th>
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<tr>
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I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

- This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3145</th>
<th>Respondent: 15323041 / Jane Doherty</th>
<th>Agent:</th>
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<tbody>
<tr>
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</tr>
</tbody>
</table>

The Surrey Hills AONB is one of the great treasures of Guildford Borough and we believe that protecting this area should be given the highest priority.

I therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3308</th>
<th>Respondent: 15327905 / Julia Cook</th>
<th>Agent:</th>
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<tr>
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POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4203</th>
<th>Respondent: 15357217 / Camilla Cressy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td></td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The areas of beauty on send hill are where we regularly walk our dogs, the travellers sites and homes would completely ruin that area for all of the community who use it daily for walking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4811  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

GROUNDS FOR OBJECTION This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6191  Respondent: 15426337 / C Cope  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed will not be sustainable

The development of over 13,000 homes is not sustainable. It will have a permanently detrimental impact on existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6296  Respondent: 15427937 / Elizabeth Lawes  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object;
To Send losing its Greenbelt status, I have personally never received any information regarding this point. Local Councillors promised this area would remain Green but know due to some developers 'needing' their large profits this does not seem to matter to them. Send would no longer exist and would merge with Woking, Clandon, Ripley and even further afield.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6715</th>
<th>Respondent: 15437505 / Terri Smart</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
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<td>( ), is Legally Compliant?</td>
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</table>

**Policy P1**

I SUPPORT the Surrey Hills Area of Outstanding Natural Beauty (AONB) being conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development and that there is a presumption against major development in the AONB in accordance with the NPPF.

However I OBJECT to inappropriate exceptions to this policy, such as the proposed "Visitor Centre" at Newlands Corner which has no place imposing itself on the most beautiful scenery in the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6779</th>
<th>Respondent: 15438945 / Jacqueline Davies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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**I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty**

- This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7492</th>
<th>Respondent: 15449377 / James Busby</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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<tr>
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<td>( ), is Legally Compliant?</td>
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</table>
Loss of green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7623  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

- This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17354  Respondent: 15460737 / Donna Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We very warmly welcome improvements to this policy which better captures the importance and value of the AONB.

We further suggest the following clarifications to avoid ambiguity:

- It is most important that “promote its enjoyment by the community and visitors to the area” specifies “enjoyment of its special landscape qualities”
- After “proposals will be assessed on their individual merits,” add, “as to whether they are consistent with conserving and enhancing the special landscape qualities.”
- The text should note that potential AONB will be based on landscape assessment by Natural England on behalf of the Minister and may include land not currently designated as AGLV.

We suggest the monitoring indicator is inappropriate. It should track absence of major development (which is in principle harmful to the statutory purpose even when deemed in the public interest) not avoidance of appeals. The currently proposed indicator could encourage the perverse behaviour of avoiding appeals.

Object: seeking improvements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1998  Respondent: 15461793 / Paul Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
The policy relating to AONB weakens the protections offered and (unlike previously) does not have restrictions on non-major developments. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now developments in the AONB seem to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
AONB and the AGLV from the previous draft Plan.
My concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:
“All proposals will be considered against whether they…”
“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”
Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:
“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”
I believe that this whole opening clause should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”
I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:
- “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
- “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
- In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate
Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
the use of countryside areas for which the area is so well known to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10861  Respondent: 15506817 / Reno Hornblow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the use of countryside areas for which the area is so well known to build more properties

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11075  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11241  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P1 - Surrey Hills Area of Outstanding Natural Beauty

I object that the AONB areas are excluded from taking a proportion of new housing developments. These areas should provide homes for local people and their families. Policies H2 and H3 should apply throughout the borough, including AONB, but proportionate and sympathetic to each location

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11247  Respondent: 15570209 / Emily Cross  Agent:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11483</th>
<th>Respondent: 15571553 / Darren Carbine</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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**Policy P1 - Surrey Hills Area of Outstanding Natural Beauty**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<table>
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<tr>
<th>Comment ID: PSLPP16/11775</th>
<th>Respondent: 15571617 / Bruce Garbutt</th>
<th>Agent:</th>
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<tr>
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</table>

**POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty - I OBJECT.**

This policy is dependent on the Surrey Hills Management Plan. The local plan welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. This is not in keeping with AONB national rules and regulations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11875</th>
<th>Respondent: 15575681 / John Francis</th>
<th>Agent:</th>
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**POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty**

I object to this policy as I am concerned it weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. The policy should be tightened up.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy P1)

At a time of reduced bus services through Ripley and no train stations nearby the cars from the extra houses will clog the already busy roads as the local transport facilities are already inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12436  Respondent: 15583393 / Jane Buckingham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )


There are clear inconsistencies within the plan itself and with the NPPF.

- **Section 3 SPATIAL VISION (Objection)**
  - Appropriate constraints (such as green belt) have not been applied to reduce the housing targets to a realistic level.
  - The draft plan’s stated preference for brownfield development has not been applied consistently in subsequent sections.
  - Clear examples are shown in our comments on section 4 below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslpp171/1660  Respondent: 15583841 / Catherine Young  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Policy P1 and E5 regarding the AONB, and AGLV land. I believe protection of the AONB has now been weakened by the re-wording of the levels of protection regarding types of development, and this policy should be strengthened to protect this national asset.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12919  Respondent: 15586017 / C Maslin  Agent:
POLICY P1 AONB

I object to policy P1 Surrey Hills Area of Outstanding National Beauty

This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

‘All proposals will be considered against whether they…’

‘All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities’

Terms such as ‘considered’ and ‘expected’ are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:

‘Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…’

This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: ‘There is a presumption against major development in the AONB in accordance with NPPF.’

In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

‘The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered’

‘Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable’

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/ or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
In addition, whilst I am very pleased to see the commitment to the preservation of the Thames Weald Heaths and the Surrey Hills AONB, I am very concerned indeed that the Green Belt is under threat to such an extent, particularly those areas affected to the east of the town. The implications of the extension of the town towards the villages (and them towards Guildford) and towards London have serious implications for the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy P1

This states “However, as a local designation, the AGLV holds less weight than the AONB in policy terms”. Whilst true, this is a serious attempt to minimise the importance of AGLV land and condition readers to the idea of AGLV land being built upon. This is unadulterated spin. AGLVs need to be protected to prevent pressure on AONBs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Protecting Policies: The Protecting Policies P1 “AONB”, P2 “Green Belt” and P3 “Countryside” are supported.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy P1)

I have been a resident in Ripley since 2010 and the weight of traffic has dramatically increased, especially when the surrounding roads and motorways (A3 in particular) are under pressure.

At a time of reduced bus services through Ripley and no train stations nearby, the cars from the extra houses will clog the already busy roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14314  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they…” “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate. Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P1 - Presumption in favour of Sustainable Development, Policy S2 - Borough Wide Strategy, Policies H1&H2 - Homes for all & Affordable Homes

- Policy S2 states provision will be made for 13,800 new homes over the Plan Period 2013 - 2033. The number of homes it too high and unsustainable for Guildford’s villages. The Site Allocations list totals 12,698

- West Horsley village expansion would be unsustainable for the proposed high number of new houses - we already have very limited local services (no post office, one small shop with barely any nearby parking, limited bus services)

- The proposed development of 385 homes on 4 proposed sites are at much higher densities than currently exist in the village - they will be out of character with existing densities and existing mix of housing styles. They won’t fit the village.

- The homes building proposals will not be sustainable in terms of roads capacity, shops, parking, schooling, drainage, parking in East Horsley (station and shops), or public transport.

- No proof has been put forward for why so many homes need to be built in West Horsley over the first 5 years of the pLan period 2018 - 2033. In fact, The West Horsley Parish Council and Surrey Community Action Housing Survey : May 2014 identified a limited need for approximately 20 affordable homes for local people who want to remain in the village (young people and elderly downsizers).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Green Belt & Countryside Study is flawed.

1. West Horsley Parish is one of a rich and varied mix of well-established low housing density settlements with a considerable number of historic buildi
2. Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors (walkers and cyclists) through the seasons each
3. The Key Evidence document "Guildford Borough Economic Strategy 2013-2031" made no case for locating large numbers of homes in West and East Horsley or neighbouring
4. Proposed new economic development site proposals are on the opposite side of the Borough to West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P1 - Presumption in favour of Sustainable Development, Policy S2 - Borough Wide Strategy, Policies H1&H2 - Homes for all & Affordable Homes

• Policy S2 states provision will be made for 13,800 new homes over the Plan Period 2013 - 2033. The number of homes is too high and unsustainable for Guildford’s villages. The Site Allocations list totals 12,698.

• West Horsley village expansion would be unsustainable for the proposed high number of new houses - we already have very limited local services (no post office, one small shop which is rumoured to be closing, barely any nearby parking, limited bus services).

• The proposed development of 385 homes on 4 proposed sites are at much higher densities than currently exist in the village - they will be out of character with existing densities and existing mix of housing styles. They won’t fit the village.

• The homes building proposals will not be sustainable in terms of roads capacity, shops, parking, schooling, drainage, parking in East Horsley (station and shops), or public transport.

• No proof has been put forward for why so many homes need to be built in West Horsley over the first 5 years of the Plan period 2018 - 2033. In fact, The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014 identified a limited need for approximately 20 affordable homes for local people who want to remain in the village (young people and elderly downsizers).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object that the AONB areas are excluded from taking a proportion of new housing developments. These areas should provide homes for local people and their families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15737  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:“All proposals will be considered against whether they…”“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:“The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”“Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate.Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17930  Respondent: 15627009 / Alison Morrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
In addition I object specifically to the removal from the Green Belt of 100 acres of ancient woodland, and the damage this will have to the integrity of the rural area and the destruction of ancient woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16188</th>
<th>Respondent: 15634113 / Joby Lees</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
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<tr>
<td>If the planning permission for the Green Belt goes ahead the Area of Natural Beauty which is why most people move here will be completely destroyed. Once gone it's gone for good and we can never get it back.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<tr>
<th>Comment ID: PSLPP16/16874</th>
<th>Respondent: 15649601 / Laura Bushnell</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>I object to Policy P1 on Areas of Outstanding Natural Beauty. The proposal significantly weakens protection of the AONB and the AGLV from the previous draft plan. Access to open space provides great educational and recreational value and therefore, the loss of such land will lead to the irreversible loss of rural leisure and tourism amenities. The natural beauty of the area have led it to become one of the most popular in the country for road and off-road cycling, even attracting events such as the annual Prudential Ride London, Tour of England and the 2012 Olympics. Events such as these demonstrate the of this area as being both rural and accessible from London and they contribute hugely to the local economy. Hence, the loss of open space would be fatal to this and many similar recreational activities, forcing people further out from London or Guildford. The wording of the proposal makes it available to abuse from developers keen to use it to their advantage, and to our disadvantage. Proposals to consider developments on an individual basis almost encourages development applications. I would like a guarantee for further protection of the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPP16/16766</th>
<th>Respondent: 15650369 / Stephanie Dean</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
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</table>
I object to this policy as I am concerned it weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. The policy should be tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Para 4.3.6 – this paragraph notes that there is a lack of national guidance on the matter of the Major Developments test within an Area of Outstanding Natural Beauty (AONB). However Natural England wish to draw your attention to the recent Inspectors Report dated June 2016, into the Vale of White Horse Local Plan Examination in Oxfordshire. This matter was discussed with regard housing allocations within the North Wessex Downs AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

“All proposals will be considered against whether they…”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.

“In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.
I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

“The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”

“Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The specific protection for the Surrey Hills Area Of Outstanding Natural Beauty and the Area of Great Landscape Value is fully supported. It is important that these most sensitive parts of the Borough are effectively protected. To ensure that these areas can be effectively protected whilst still ensuring that the Council meet their growth targets it is essential that full and proper use is made of all other potential locations for growth. The identification of Site Allocation A45 supports this policy objective and the Council are urged to ensure that maximum productive use is made of this site.

**SUPPORT POLICY**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The policy relating to Surrey Hills AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

We OBJECT to the loss of the five tests which were previously included. Previously it was suggested that all proposals should be considered as to whether they
- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
- Support the rural economy of the Surrey Hills area
- Provide or maintain public access to the AONB

These tests are significant and important and the loss of these tests is a serious diminution of the protection afforded to the AONB. They should be reinstated. Similarly the deletion of the presumption against inappropriate development means that inappropriate development is not necessarily going to be rejected – which would seem to be in contravention of the policies and the principles of the AONB, which the borough council has a duty to protect. This too should be reinstated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The AONB and Green Belt are national assets, necessary for the health and wellbeing of all the population (this may be the reason for the above average health enjoyed, currently, by the local population). Yet many of the large developments outlined will destroy these precious areas for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17694  Respondent: 15922337 / Andrew Malcher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Plan Policy P1: Surrey Hills Area of Outstanding Natural Beauty
This policy weakens the protection of the AONB and the AGLV. These assets are irreplaceable and must have the highest protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15571  Respondent: 15977889 / Charles Kimpton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. This policy continues to seek to justify development on protected land, contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1499  Respondent: 15977889 / Charles Kimpton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A39: Land near Horsley railway station, Ockham Road North, East Horsley
Policy A43: Land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley
Policy A58: Land around Burnt Common warehouse, London Road, Send
These sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. Policy P1 and E5: AONB

I OBJECT to the deletion of restrictions on non-major development in the AONB, which appears to dispense with the previous five key tests. This runs contrary to Government policy enshrined in the NPPF, public opinion as voiced in previous consultations and Guildford Council leader’s increasing assurances that the AONB will be afforded the highest level of protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Green Infrastructure

The amendments to the supporting text which clarifies that Natural England has agreed to review the AONB Boundary and that the work is included in the current work programme are supported. MVDC notes the policy name change and that the AGLV will be retained until such time as there has been a review of the AONB boundary. Please note that MVDC is committed to and would wish to be involved in this cross boundary green infrastructure review.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The addition of the AGLV to the policy title gives the impression of equal status with the AONB. The AGLV is a local designation and not a national designation. This is not clear either from this change to the title or in the policy text itself, thereby giving the impression of unwarranted equivalence.

If the AGLV is to be referred to in the title then the policy text should be changed to make it clear that the AGLV is a local designation and does not have the same status as the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See text above.

Attached documents:

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Comment ID: pslp171/868  Respondent: 17309793 / Shere Parish Council (Suzanne Hoyland)  Agent:  

The council considers that the new version of the policy P1 Surrey Hills Area of Outstanding Natural Beauty gives less protection to the AONB than the text previously proposed. They believe that the text:

> “will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they:

- conserve and/or enhance the setting and views of the AONB
- conserve wildlife, historic objects or natural phenomena within it
- promote its enjoyment by the community and visitors to the area
- support the rural economy of the Surrey Hills area
- provide or maintain public access to the AONB.”

should not be changed to the proposed text:

> “will be conserved and enhanced to maximise its special landscape qualities and scenic beauty.

(2) In accordance with national planning policy, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest.

(3) High priority will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting.”

[It is recognised that paragraph (2) relates to the subsequent part of the policy and not to the text noted above that is proposed to be removed.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The council considers that the new version of the policy P1 Surrey Hills Area of Outstanding Natural Beauty gives less protection to the AONB than the text previously proposed. They believe that the text:
“will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they:
• conserve and/or enhance the setting and views of the AONB
• conserve wildlife, historic objects or natural phenomena within it
• promote its enjoyment by the community and visitors to the area
• support the rural economy of the Surrey Hills area
• provide or maintain public access to the AONB.”
should not be changed to the proposed text:
“will be conserved and enhanced to maximise its special landscape qualities and scenic beauty.
(2) In accordance with national planning policy, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest.
(3) High priority will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting.”
[It is recognised that paragraph (2) relates to the subsequent part of the policy and not to the text noted above that is proposed to be removed.]

Attached documents:

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**Comment ID:** pslp171/3512  **Respondent:** 17345441 / Thakeham Homes (Sarah Sutcliffe)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

We note the extension of the existing AGLV boundary within the Proposed Submission Local Plan resulting in this policy now ‘washing over’ the settlement. We do not consider that this is appropriate use of AGLV policy, as there is no justification to support the application of this designation across the settlement. We would suggest that the areas within the settlement boundary do not perform the required function to warrant designation as AGLV. We consider that the AGLV designations within settlement boundaries should be reviewed and omitted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1397  **Respondent:** 17382113 / T J Lindsay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Areas of Outstanding National Beauty - P1 and E5
The protection of AONB's appears to be weakened with the removal of restrictions (flt non-major development. This is contrary to the responses from the public in previous consultations. I object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests - how development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Albury Parish Council strongly objects to the proposed changes to the wording in paragraphs 1 and 4. Specifically, we request that the newly added text is retained in addition to any deleted text. It is imperative that this stronger wording is kept unchanged in order to protect the AONB. The new proposed text is too vague and open to abuse. The AONB was defined in the National Parks and Access to the Countryside Act 1949 and as such has always been offered special protection. The AONB exists in its current unspoilt form today only because of stringent planning policy restrictions in the past. These must be retained for continued protection and all existing boundaries similarly retained.

Points 2 and 3 should be retained as shown. In Point 5 the AGLV boundaries as currently set should be retained in order to protect the AONB.

Page 52 4:3:5 and 4:3:6

should be retained in their original un amended form as they offer greater protection to the AONB.

Page 53 4:3:8

The AGLV must be retained with its current boundary to protect the AONB, particularly as not policy has been written yet to protect it under the Development Management Policies DPD. No review can take place until this is in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the removal in para 4.3.18 of “where it would not have a greater impact on the openness.” and the replacement by “subject to the impact”. This is completely in contravention of the purposes of the green belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2551  Respondent: 17463137 / Brad Day  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The policy relating to Surrey Hills AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable.

This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

I OBJECT to the loss of the five tests which were previously included. Previously it was suggested that all proposals should be considered as to whether they

- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
- Support the rural economy of the Surrey Hills area
- Provide or maintain public access to the AONB

These tests are significant and important and the loss of these tests is a serious diminution of the protection afforded to the AONB. They should be reinstated.

Similarly the deletion of the presumption against inappropriate development means that inappropriate development is not necessarily going to be rejected – which would seem to be in contravention of the policies and the principles of the AONB, which the borough council has a duty to protect. This too should be reinstated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2600  Respondent: 17463841 / The Earl of Onslow and the Trustees of the Clandon Estate  Agent: WYG Planning (Sarah Evans)
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2.62 We note the inclusion of the AGLV within the terms of policy P1 and the proposed amended wording. While the changes themselves are limited in nature, we would have to question the continued relevance of the AGLV in light of the comprehensive landscape character assessments of the Borough carried out as part of the Local Plan review, developments since the original designation as a buffer to the AONB, the identification of landscape character areas to help guide consideration of landscape change and in the knowledge of the reappraisal of the AONB boundary which all reduce its relevance. The protection and enhancement of landscape character and distinctiveness is better served by the landscape character assessments at an individual level.
Removing the 5 tests for development in an ANOB has made for a weaker policy for controlling development in these areas. This goes against the stated aim that ANOBs should be protected as a high priority.

I object to Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?