Guildford borough Submission
Local Plan: strategy and sites

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

December 2017

Document 10 of 12

Sections covered
Appendix A: Glossary
Appendix A1: Maps showing 500m buffer of public transport interchange
Appendix A2: Evidence of active and comprehensive marketing
Appendix B: Town Centre Shopping Frontages
Appendix C: Infrastructure Schedule
Appendix D: Evidence base
Appendix E: Superseded policies
Appendix F: Policies overview map
Appendix G: Policies and monitoring
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Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Appendix A - Glossary
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPA16/748  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

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

Where is the definition for 'exceptional circumstances'?

The definition for 'insetting' bears no resemblance to the way in which it is being implemented? In relation to this, perhaps there should be a definition for 'openness'

Isn't there a problem with 'double speak' here, when language is being subject to a glossary in order to explain the alternative definitions that GBC and or planning dept's have given it? The biggest issue being the difference between the term objective and subjective, ie an OAN where no-one has the methodology behind it is not objective or transparent in anyone's eyes but some planners and GBC Cllrs (not all). The Greenbelt sensitivity map is subjective as are other assessments where the decisions resulting from criteria used are made on a site by site basis on someone's opinion (who themselves are not always representing independent companies).

One of the criticisms of the Draft Plan was the complexity and difficulty in understanding the Plan and tracking changes.

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

Attached documents:

Comment ID: PSLPA16/4542  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

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

Glossary(Appendix A)

Special Area of Conservation (SAC) appears twice.


Biodiversity: Biodiversity is the variability among living organisms from all sources including, among other things, terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are part; this includes the diversity within species, between species and of ecosystems (source: UN Convention on Biological Diversity).

Practically, the term is synonymous with both ‘habitats and species’, and ‘wildlife’.

Certain of these suggested insertions and corrections would also need to be carried through to the Green & Blue Infrastructure Topic Paper.

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

Attached documents:
To review a local plan from a standing start is a big task and has required a lot of reading and detailed research. Along the way I have come across well informed opinion from individuals and organisations.

NMSS is a consultancy company specialising in housing demographics whose principal is Neil McDonald.

Green Balance is a consultancy company specialising in housing demographics whose principal is Richard Bate.

On matters of road infrastructure, we have relied on comments by Richard Jarvis of the GRA who was previously a highways consultant with WS Atkins.

References to “local plan” are intended not to be the previous 2003 Local Plan but to be references to the current Regulation 19 draft local plan prepared by Guildford Borough Council.

GBC refers to Guildford Borough Council.

SHMA refers to the Strategic Housing Market Assessment 2015 prepared by GL Hearn.

OAN refers to the Objectively Assessed Need in relation to housing.

NPPF refers to the National Planning Policy Framework.

CPRE refers to the Campaign for the Preservation of Rural England.

GRA refers to the Guildford Residents Association which comprises over 25 Residents Associations and five Parish Councils.

SHB refers to Save Hogs Back and SSAG refers to the Save Send Action Group which comprises over 500 residents.

ELNA refers to the Employment Land Needs Assessment 2015.

NPPF refers to the National Planning Policy Framework.

NPPG refers to the National Planning Policy Guidance.

VoA refers to the Valuation Office Agency.

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

Attached documents:
The definition in the glossary states that it is a statutory designation, which is not the case. Green belt is a policy instrument and is not statutory.

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: PSLPA16/4527</th>
<th>Respondent: 10858977 / Angela Otterson</th>
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**DEFINITIONS AND SOURCES**

To review a local plan from a standing start is a big task and has required a lot of reading and detailed research. Along the way I have come across well informed opinion from individuals and organisations and I make no apology for including what I believe are correct and clearly expressed statements regarding the wide ranging issues to hand. I would therefore like to give thanks to others for their valuable contributions. However, I have of course referenced all statements made by retained consultants by GRA and CPRE e.g. NMSS and Green Balance.

NMSS is a consultancy company specialising in housing demographics whose principal is Neil McDonald

Green Balance is a consultancy company specialising in housing demographics whose principal is Richard Bate

On matters of road infrastructure, I have relied on comments by Richard Jarvis of the GRA who was previously a highways consultant with WS Atkins

On matters of property research, development, planning and valuation I have relied on my own skills and experience as a former Chartered Surveyor and Management Consultant specialising in property strategy and research in the public and private sectors. I have also used some material from my review of the Town Centre Masterplan 2015 which I reviewed for the Guildford Greenbelt Group and which can be found on their website.

References to “local plan” are intended not to be the previous 2003 Local Plan but to be references to the current Regulation 19 draft local plan prepared by Guildford Borough Council.

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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:** pslp173/107  **Respondent:** 11051521 / J and M Baylis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix A: Glossary

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

Enlarged definition of Viability noted.

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

Enlarged definition of Viability noted.

Attached documents:

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**Comment ID:** PSLPA16/736  **Respondent:** 14149857 / GBC (Caroline Reeves)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix A: Glossary

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

The DPDs will be hugely important and should be the key to the success of any scheme or application. Hopefully they will cover in detail the key issues of design, heritage, vernacular architecture, sustainability etc etc. Should this be more clearly defined here?

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

Attached documents:

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**Comment ID:** PSLPA16/1203  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix A: Glossary

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

5  DEFINITIONS AND SOURCES

5.1 To review a local plan from a standing start is a big task and has required a lot of reading and detailed research. Along the way I have come across well informed opinion from individuals and organisations and I make no apology for including what I believe are correct and clearly expressed statements regarding the wide ranging issues to hand. I would
therefore like to give thanks to others for their valuable contributions. However, I have of course referenced all statements made by retained consultants by GRA and CPRE e.g. NMSS and Green Balance.

5.2 NMSS is a consultancy company specialising in housing demographics whose principal is Neil McDonald

5.3 Green Balance is a consultancy company specialising in housing demographics whose principal is Richard Bate

5.4 On matters of road infrastructure, I have relied on comments by Richard Jarvis of the GRA who was previously a highways consultant with WS Atkins

5.5 On matters of property research, development, planning and valuation I have relied on my own skills and experience as a former Chartered Surveyor and Management Consultant specialising in property strategy and research in the public and private sectors. I have also used some material from my review of the Town Centre Masterplan 2015 which I reviewed for the Guildford Greenbelt Group and which can be found on their website.

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5.13 SSAG refers to the Save Send Action Group which comprises over 500 residents

5.14 ELNA refers to the Employment Land Needs Assessment 2015

5.15 NPPF refers to the National Planning Policy Framework

5.16 NPPG refers to the National Planning Policy Guidance

5.17 VoA refers to the Valuation Office Agency

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

Attached documents:

Comment ID: PSLPA16/123  Respondent: 15130625 / Joan Alldis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix A: Glossary

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

I object to Send being removed from the green belt as it provides a buffer between Woking and Guildford. Particularly vulnerable areas of land are being taken out of the green belt namely; 1. The land behind the school including playing fields and woodland; 2. The land to the right of Cartbridge by the river Wey navigation up to the new boundary fence with Vision Engineering and 3. Land to the left of Cartbridge going up to the old depot on the Wey navigation.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 9.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Appendix A1 - Maps showing 500m buffer of public transport interchange
APPENDIX A1 – Maps showing 500m Buffer of Public Transport Interchange

A. The Guildford Society welcomes the inclusion of this map. We do feel it should show all of the areas within 500m and 1km of each of these transport interchanges and all other railway stations in the Borough to show prime opportunities for sustainable development, providing other national and regional planning policies (notwithstanding special circumstances) permit

[Guildford Stations Map]
[Ash Station Map]
[Ash Vale Station Map]
[Clandon Station (with Guildford East (Merrow) Station]
[East Horsley & Effingham Junction Stations]
[Gomshall Station (entirely surrounded by Surrey Hills AONB)]
[Shalford & Chilworth Stations]
[Wanborough Station]
[Worpleson Station]

B. It is very significant that the Surrey Research Park currently falls well outside the 500m and even a 1500m buffer from any station. The desirability of the Guildford West Station is self-evident from an employment perspective.

C. Another major employment centre, Slyfield Industrial Estate, also falls outside the range from any station, identifying the benefit that would be derived from the Sustainable Movement Corridor extending to the Estate and a new Park & Ride for business and shoppers at the northern edge of the Estate (as previously proposed in the Guildford Society representations.

D. There remains no solution in the local plan for connecting the town to Guildford Business Park and Cathedral Industrial Estate close to the A3 at the Dennis Roundabout (Wooden Bridge).

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

Attached documents:
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Appendix A2 - Evidence of active and comprehensive marketing
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

E. The Guildford Society welcomes the introduction of this Appendix. It may not be a perfect summary of marketing on each occasion but should help give adequate protections where prescribed in the local plan.

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

Attached documents:

Appendix A2 Evidence of active and comprehensive marketing

This new exposition of strengthened policy is welcome.

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

Attached documents:

Total records: 2.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Appendix B - Town Centre Shopping Frontages
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

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</table>

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

F. The Guildford Society by and large accepts the hierarchy as shown.

G. It is a pity the Settlement Profiles Report does not provide greater clarity in respect of the quality, role and accessibility of Local and District Centres, as this would allow a more informed policy that also had regard to the state of local public houses and other A3 community uses. This should also extend to farm shops and should provide some clarity in respect of petrol filling stations with associated shops, farm shops and garden centres. There is apparently no clear policy on food retail and out-of town retail such as the Ladymead Retail Park and car showrooms, all of which have a part to play in our economy and communities as employers and service providers.

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

Attached documents:

Total records: 1.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Appendix C - Infrastructure Schedule
I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

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

**Attached documents:**

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3. Inadequate Infrastructure

The substantial number of houses proposed between the M25 and Burpham will result in merging and inevitable urbanisation of the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Ockham, Ripley, Send and Clandon, with no plans to remedy this. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic as well as a significant decline in air quality.

The A3 would need substantial improvements, including widening as well as rebuilding and improvement of multiple junctions before any development is allowed. Any planned development must not be allowed until such road improvements are completed. However it seems clear that Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), should not take place.

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

**Attached documents:**

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Solutions

To address these concerns **the Local Plan must be amended** to demonstrate a strong commitment to:
• implementation of the whole of the 'Anticipated Improvements' documented in the Guildford Borough Transport Strategy 2016 before any of the proposed additional development commences;

• implementation of the majority of 'Aspirations' documented in the Guildford Borough Transport Strategy 2016 within the first five years of the Local Plan period commencing (a specific ‘by date’ must be quoted). Crucially, this commitment must include all those 'Aspirations' shown under the 'Local Roads and Parking Strategy’. A commitment to build the proposed A3 tunnel must be made within the first five years of the Local Plan period commencing but we are realistic enough to accept that completion will take rather longer;

• protecting land required for the proposed Sustainable Movement Corridor;

• protecting land required for the proposed A3 tunnel portals;

• protecting land required for a high quality and well positioned central bus facility in, or immediately adjacent to, the heart of the Town

In addition a new road bridge over the River Wey and railway must be built to help movement in our physically divided town and provision should be made for this in the Local Plan, otherwise the opportunity to provide this much needed infrastructure will be lost forever.

The Guildford Town Centre Transformation Package, referenced in the Guildford Borough Transport Strategy 2016, must include good access and priority for local buses serving all areas of the Town, not just those serviced by the proposed Sustainable Movement Corridor (SMC). For example, Guildford Park Road and Aldershot Road (to name but two of the areas Safeguard serves) will not benefit from the SMC.

Failure to make it clear in the Local Plan that these infrastructure developments must occur before developments starts is vital, otherwise we believe developers will take commercial advantage and undertake development without the necessary infrastructure being in place first which would be an unmitigated disaster for Guildford.

Summary

We are surprised and concerned at the scale of development proposed in the draft Local Plan, given its present deficit of transport infrastructure and the barriers to easy movement.

Traffic congestion and the consequent lengthening, and unpredictability, of journey times and the negative impact on customer experience is a major issue.

The revised draft Local Plan pays insufficient attention to the much needed transport infrastructure upgrades meaning that further proposed development will put more pressure on the existing transport systems, particularly the local and strategic road network, creating major difficulties for public transport, hampering economic growth in the area and damaging local businesses.

The Local Plan must be amended to demonstrate a strong commitment to implementing the whole of the 'Anticipated Improvements' in the Transport Strategy before any of the proposed additional development commences and to implementing the majority of 'Aspirations' within five years of the Local Plan period commencing.

Land required for the proposed Sustainable Movement Corridor, A3 tunnel portals, well positioned central bus facility in the heart of the Town Centre and a new road bridge over the River Wey and railway must be protected in the Plan.

Offer of Further Engagement

I will be pleased to engage with Guildford Borough Council officers and/or councillors to discuss our concerns in order to ensure that the Local Plan delivers a Guildford that works for all - residents, businesses and visitors alike - and is a Plan that we can all be proud of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy I1: Infrastructure and delivery

and Appendix C - Transport infrastructure

This has been reviewed in detail by Richard Jarvis, a qualified civil engineer and expert in transport planning. His reports of the transport modelling and non road proposals are attached in Appendix 2. Also see comments on questions 1 to 3.

The transport infrastructure proposals are best summed up by “too little, too late”.

The Sustainable Movement Corridor is only shown as a concept. Its reliance on existing roads means its impact will need to be assessed and we do not have any indication of use. For example, will London Road traffic be deflected along Epsom Road and what will happen to queuing time at junctions for traffic that is not prioritised?

An appropriate site for a central bus interchange, so you can go in any direction from one point, has not been allocated.

There is no additional road bridge over the river and railway for our physically divided town.

We strongly welcome the Leader’s clear call that development should be contingent on infrastructure delivery and the policy that infrastructure should be available “when first needed”. However, policy I1 needs to be considered alongside the infrastructure proposals in Site Allocation policies A24, A25, A26 and A35 184-192, 211-212 for strategic sites. These are discussed here to avoid duplication.

The following wording is of concern: “regard will be had to the delivery and timing of delivery of the key infrastructure requirements on which the delivery of the plan depends, set out in the Infrastructure Schedule in the latest Infrastructure Delivery Plan, or otherwise alternative interventions which provide comparable mitigation.”

We believe the weak wording “have regard to”, on which this policy hinges, needs to be tightened. Also the option of alternative mitigation could be used to justify a sticking plaster approach and to kick infrastructure provision into the long grass. We refer to our letter in Appendix 4 and the positive reply from the Council leader.

We are delighted to see reference to an A3 tunnel beyond the Plan period but we are concerned that land is not safeguarded for entrances or works areas. Even for projects within the Plan, it is not clear that all requisite land has been safeguarded (eg railways stations and sustainable movement corridor).

Object: Inadequate

[From appendices:]

Appendix 2: Transport Infrastructure Part 1 and Part 2

These reports, the first looking at highways and traffic, the second at transport other than the strategic and local road network, are prepared by Richard Jarvis BSc, MS, CEng, FICE, FCIHT.
Richard Jarvis is a retired planning and management consultant. He has many years’ experience as a transport planner, managing a wide range of projects in the UK and around the world. He led studies for highways, city planning and public transport. He has acted as an expert witness at public inquiries.

COMMENTARY ON THE PROPOSED SUBMISSION LOCAL PLAN AND TRANSPORT INFRASTRUCTURE

Highways and Traffic

1. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The Plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.
2. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by SCC at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions in the borough from 2009 to date. It represents today’s circumstances, with the addition of growth in traffic to 2031 outside the borough and in Waverley in line with their plan. The results for this scenario correspond to the current unsatisfactory traffic conditions in peak periods.
3. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the Plan. The Scenario 5 results show that there will be widespread congestion in the morning peak hour across the network in 2031. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11 will be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHAR results provide evidence that congestion will be worse in 2031 than it is today on much of the network.
4. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre.
5. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3), and those in Tables 4.3 and 4.4 with levels of service E and F that will not benefit from the improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’.
6. The cumulative effect of the additional traffic generated by the developments in the Plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we do not accept the conclusion that the developments would have ‘an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’.
7. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major improvement scheme being studied by Highways England for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore there will be a period in which the existing A3 will have to carry additional traffic associated with those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR:
• Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey Research Park and the RSCH through the development (para 4.7.3)
• Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/ B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8)
• Wisley Airfield– traffic will increase on minor roads to gain access to the A3 (N and S bound) and to other routes (para 4.7.11). The development will add more traffic to the A3. The Burntcommon slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)
• Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Lane, B3000 junction, but increasing at the Puttenham Hill/Millbrook junction
• Ash – development in Ash is not specifically addressed, but there are large increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction)
• Slyfield – there are no remarks relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted in error. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane
• Town Centre – the report has very little to say about the town centre. The model results forecast severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. There are no highway mitigation measures in the PSLP for the centre. In the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined in the SHAR, but traffic using the A281 from Waverley, for example, would be affected. The PSLP does include a new park and ride facility at Gosden Hill and the Sustainable Movement Corridor, which is discussed in a separate note.

8. The PSLP does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen.

9. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the PSLP. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, to which they are unsuited. The model results show an increase of 47% over 2009 in Scenario 5.

Appendix 2: Transport Infrastructure Part 2

COMMENTARY ON THE PROPOSED SUBMISSION LOCAL PLAN AND TRANSPORT INFRASTRUCTURE – part 2

1. Appendix C of the Plan includes the following categories of transport infrastructure in addition to the Strategic Road Network and the Local Road Network which are discussed in a separate note:

• Park and Ride
• Sustainable Movement Corridor
• Bus Transport
• Active Modes

Each of these is considered below.

Park and Ride
2. There is one Park and Ride project in the Infrastructure Development Plan which is a new facility at Gosden Hill Farm. This is to be delivered by the developer of the site and the Transport Topic paper states that the intention is that it will operate without any public funding with 500-700 spaces. It is expected that the site will be use by drivers on the A3 southbound heading into Guildford town centre (TTP para 5.60). It is not clear how this ‘mitigates the traffic impact of the Gosden Hill Farm site’ (PLSP App C P&R1), though there could well be residents of the new development who may choose to use the P&R bus service. The Park and Ride facility is not related to the proposed new Merrow Station.

3. There is an absence of any park and ride proposal east of the town centre, which would surely benefit from one.

Sustainable Movement Corridor

4. This is an ambitious concept. Policy I3 in the Plan states that the SMC ‘will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists’. It will link the new developments in the west to those in the east via the town centre. It is estimated to cost £70-90m, with funding coming from developers and the Local Growth Fund. The recognition of the importance of sustainable travel is welcome. Connecting new developments to the town centre, as in the case of SMC1 and SMC2, is sensible, but the need for a ‘corridor’ is unproven.

5. The latest information on the project has been supplied in a paper ‘Progress Update on the SMC Scheme’ published by GBC on 6 June 2016. This explains that studies have been carried out for sections 1-5 of the proposed route, and further work is needed. The SMC will use existing roads for the majority of its length, so this means that it will affect the allocation of carriageway between road users. Two design formats have been identified, ‘type 1’ involving separate lanes for the SMC, and ‘type 2’ in which bus priority measures are introduced at congestion sections and interchanges. The majority of the route is likely to be ‘type 2’ according to Table 1 of the Progress Update. This will be challenging because the road width on several sections will limit what can be achieved without a major impact on other traffic.

6. The Plan states in para 4.6.24, that ‘journeys will be rapid and reliable by bus and safe and direct on foot and by bike’. The ability to deliver rapid bus services in peak periods has not been demonstrated. There has been no quantification of the potential demand to use the SMC. Securing funding from the Local Growth Fund requires an economic justification.

Bus Transport

7. There are two projects in the Plan relating to buses. The first is labelled ‘New Guildford town centre bus facilities’. This is essential and the absence of a site for a bus station in the Plan is a serious weakness. Delivering a focus for town centre bus services and the SMC surely should be a key feature of town centre planning. The improvement of bus connections to the station is also needed.

8. The second project is for bus/rail interchange at Effingham Junction station (or Horsley) is desirable if the Wisley Airfield development proceeds.

Active Modes

9. The schemes listed are welcomed.

Rail

10. There six projects listed in the Plan of which four will be delivered by Network Rail as part of their investment programme. The other two are the new stations, Guildford East and West, which will increase rail access to development sites, and the hospital in the case of the West station, and are to be welcomed for that reason.

11. The Plan does not deal with the fact that the Portsmouth/London main line is extremely busy in peak periods. Commuters from Guildford to London frequently have to stand, and this is in spite of longer trains having been introduced. Capacity is limited in the area between Surbiton and Waterloo and this is the focus of Network Rail investment (project NR5) that is scheduled to start in 2029. The growth proposed in the Plan for Guildford will undoubtedly mean more people will want to commute, adding to pressure on the congested services, in the period before the frequency of services can be increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
SRN1 and SRN 6 should be reinstated.

The addition of LRN 23, LRN24 and LRN25 is supported.

The funding sources for many of the Local Road Schemes have been changed to ‘Developer’ only. The highway authority, SCC, is not proposing any schemes of its own. Is this due to lack of funds, or a belief that nothing more is needed?

The addition of BT5 and BT6 is supported

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

Dear planning - I have read the local plan and am shocked to see that although there is substantial development in my area there is no commitment to providing an access for Beechcroft Drive.

As you are aware the access to Beechcroft Drive is direct into the A3 and is a dangerous junction. This was a commitment in the previous plan that was not delivered and it is essential that the borough includes it in this plan.

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

H. The Infrastructure Schedule has most substantially been changed to place the burden of providing infrastructure onto developers with a change from ‘Developer Contribution’ to ‘Developer Funded’
I. We have tallied up the given costs for developers as £1.169 billion for which developers will be partly or wholly responsible; we also note 46 further lines where developers are either solely or in part required to fund infrastructure works.

J. There has not been (to our knowledge) any adjustment made to the Viability Assessments to establish whether or not the plan remains viable, the strategic objectives of delivering affordable housing and infrastructure will be achieved and, indeed, with development ‘contingent’ on infrastructure, whether there will or even should be any development in the Borough. This is a very poor position from which to judge the soundness of the plan.

K. The most significant comments, however, are that a. there are no accompanying plans for the works that would show what is proposed to be done and allowing us to evaluate or estimate the effect on the remaining infrastructure; and b. there is no indication of the dependencies that are implicit in the statement that developments are ‘contingent’ on infrastructure.

L. Although already committed, we believe that the replacement of Walnut Bridge between 2017 and 2021 may prove to be premature if its design does not take account of both expected development on the Bedford Wharf site to the east and its relationship with any Railway Station development on the west as well as considerations for crossing Walnut Tree Close.

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

Attached documents:
• Many of the drains are blocked or otherwise in extremely poor condition, giving rise to frequent surface water flooding when it rains. The southern edge of the Horsleys Area lies on the ‘spring line’ at the foot of the North Downs and is recognised in the GBC Infrastructure Delivery document as a Surface Water Flooding Hot Spot, viz:

Surface Water Flooding Hot Spots Map â€“ Horsleys (extracted from GBC Infrastructure Delivery document page 22)
• The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or disabled persons in wheelchairs.
• There are insufficient school spaces for the number of local children needing them, with the result that children are allocated to schools a significant distance away such as Dorking or Woking
• The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of West Horsley, there are only four proposals mentioned in Appendix C:

LRN 22 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

SANG 8 – Strategic Alternative Natural Green Space, Long Reach Farm, West Horsley. Years 1-5. Delivered by Landowner at cost of £7,573,822 from Developer contributions. NOTE: Long Reach Farm does not appear on any map. WHPC Comment: SANG 8 would result, if granted permission, in the loss of open agricultural land in the Metropolitan Green Belt. The land contributes greatly to the openness of the Green Belt.

SANG 9 – Bespoke Strategic Alternative Natural Green Space, Ben’s Wood, West Horsley. Years 1-5. Delivery by Developer with Developer contributions.

There are no proposals in respect of all the existing problems with for example drainage, roads, pavements and schools.

Furthermore, it is inevitable that the proposed developments in West Horsley itself and nearby, in East Horsley and the proposals for Wisley, will put enormous strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, WHPC submits this needs to be done much earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for West and East Horsley which, if taken together, would result in the building of 593 new houses in the two parishes that today are served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggests that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Draft Local Plan to provide for any more school places in the Horsleys.

WHPC submits that the failure to address the inadequacies of the existing infrastructure, never mind GBC’s proposed growth in housing, is a serious deficiency in the Proposed Submission Draft Local Plan. The Plan is therefore UNSOUND.
WHPC OBJECTS to the lack of detailed infrastructure proposals to not only cater for development in West and East Horsley but also throughout the Borough. As drafted the proposals do not meet the stated objective of providing infrastructure to support the proposed developments.

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: PSLPA16/136  
Respondent: 8565153 / Mr David Gianotti  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools; and
- I object to the lack of immediate provision for doctors surgeries.

Please see sense and stop this now!

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

Attached documents:

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Comment ID: PSLPA16/4402  
Respondent: 8565217 / Cobham Conservation and Heritage Trust (David Bellchamber)  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

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.

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

Attached documents:

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Comment ID: PSLPA16/952  
Respondent: 8568193 / Miss Edwina Attwood  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

17.1 OBJECT to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/1922  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

• Woking Borough Council will be concerned if there are any unmitigated traffic implications of the development proposals in the Guildford Local Plan that would have adverse impacts in the Borough. The development of some of the strategic sites identified in the Local Plan such as the Former Wisley Airfield would potentially have significant traffic implications in Woking if the impacts are not addressed. The implications of developing the proposals in the Plan on the road network such as the A3 corridor would be severe if appropriate mitigation is not identified and delivered as part of developing the sites. Appendix C of the Local Plan sets out the transport infrastructure projects identified to support the delivery of the Plan. This includes a number of projects to improve the A3 corridor and other road networks with indicative costings and funding sources. Woking Borough Council is aware that Highways England is still in the process of testing various options for A3 corridor improvements. The outcome of this work is not yet known. It is expected that the outcome of the work will be reflected in the Local Plan and if necessary used to refine the projects set out in Appendix C. Any adverse impacts should be appropriately addressed to ensure the sustainable delivery of the Local Plan without exacerbating the existing traffic conditions in Woking.

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

Attached documents:

Comment ID: PSLPA16/1923  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

• The Local Plan should be supported by adequate infrastructure, in particular, educational facilities. This is necessary to avoid any additional pressure on existing infrastructure in Woking Borough. Appendix C sets out the education facilities identified to support the Local Plan. However, unlike the early years and primary school provision, the provision of secondary schools has no delivery timetable and who is likely to deliver. It is clear from the evidence that to deliver the housing requirement, the education infrastructure in Appendix C will be necessary. Consequently, it will be helpful if indicative dates for their provision are provided and are aligned to when development are likely to come forward.

• On a minor point, the Local Plan would be further enhanced if it includes a section on how it will be implemented and the conditions for its review.

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

Attached documents:
The Local Plan should be supported by adequate infrastructure, in particular, educational facilities. This is necessary to avoid any additional pressure on existing infrastructure in Woking Borough. Appendix C sets out the education facilities identified to support the Local Plan. Guildford Borough Council should make sure that the list of infrastructure is adequate to mitigate development impacts across the borough.

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

Attached documents:

This gives an overview, but no detail at all. 'Improvements to X road' doesn't tell us what the improvements are, who will benefit, where in the road etc. The schedule is weak and advocates much of the funding to developers who are also expected to supply 40% affordable housing? the two do not tally. Far more details are needed and detailed maps as well as clear ideas of the benefits (assessed) these changes will bring.

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

Attached documents:

The infrastructure schedule falls a long way short of the requirements that would be generated by this draft Local Plan.

The earliest dates for the railway stations at Park Barn and Merrow are not expected before 2024 (six years later than first anticipated).

Two road safety schemes for the A3 have been abandoned.

SCC appear to have washed their hands of involvement in the delivery of a number of highway developments on the local road network (which is their responsibility) - e.g. those in LRN7.

LRN7 (For Wisley Airfield) is an example of inadequate infrastructure requirements to address the problems that would be created by a strategic site.

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

Attached documents:
Comment ID: PSLPA16/1475  Respondent: 8575585 / Ian Macpherson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Appendix C: Infrastructure Schedule

SRN2 to 4 are highly relevant, but there is no detail to assess impact.

LRN1 is a major complex and untidy package of considerable significance to those of us who live near the town centre and have to cross it (there being no other way round) to go about our business. It presumably includes the consequences of whatever is decided about the ‘Town Centre and Hinterland Masterplan’ of Allies and Morrison 2015.

Yet there is no detail. It is understood from the odd account, for example, that a major restructuring of the Gyratory is under consideration, with consequential significant or highly significant reduction in capacity -which will have a serious impact on my mobility (eg getting to my surgery or the RSCH or the M25). I cannot accept this unseen, and would be grateful if you would take this as a formal objection to the present consultation procedure.

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

Attached documents:

Comment ID: pslp173/693  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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

Considering concerns across the communities of Guildford, little has in reality changed since 2014: For instance, the proposals for Garlick Arch and the two slip roads to nowhere have not been assessed as viable by way of infrastructure or effects on traffic movement through the north of Guildford. The LPA’s declared position in 1984, which identified traffic requirements essential to make C1 C2 (B25 – now policy A 25) viable, are now simply dismissed and cheaper, less rational mitigation measures are put forward. In reality will destroy the existing communities of Ripley, West Clandon, Send, Merrow and Burpham, by virtue of increased of pollution and traffic levels.

An opportunity to access the B2234 is a case in point. There is no legal access from Gosden Hill to the B2234 and no land has been set aside for such a link. Thus while implying this site will not be a giant cul-de-sac, in reality it can be nothing less without the land being set aside.

Railway

In respect of the proposed Merrow railway station, the current Wessex Route Study Final report of 21st August 2015 [para 2.7.5 page 22], while mentioning that there ‘were proposals’ [Park Barn and Merrow] takes the matter no further than that, and certainly not before 2045. Therefore there is no evidence before the inspector to suggest Merrow railway station will occur in the life of this Local Plan, with corresponding consequences for the Gosden Hill allocation, namely a further lack of required sustainable infrastructure to make the development viable.

Further, the Wessex route study proposes an extra platform to the town side of the station and elsewhere on the line, flyovers for the railway tracks. No land has been set aside for these proposals by the Guildford Local plan, thus suggesting any land within 100 metres or more of rail tracks that is built on, could hamper the efficiency of a major infrastructure improvement.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2928</th>
<th>Respondent: 8582017 / The Clandon Society (J Wright)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
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<tr>
<th>Comment ID: PSLPA16/3308</th>
<th>Respondent: 8582977 / Guildford Environment Forum (John Bannister)</th>
<th>Agent:</th>
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<tbody>
<tr>
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<tr>
<th>Comment ID: PSLPA16/1601</th>
<th>Respondent: 8585697 / Laurence Edwards</th>
<th>Agent:</th>
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<tr>
<td>Paragraph 3.6 of the Infrastructure Study is incorrect. The Hockford Sewage works have been omitted in error.</td>
<td>Following the precedent set by a nearby local planning authority, I believe that all major developments must install all necessary infrastructure for the complete development at commencement.</td>
<td></td>
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</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3753  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

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The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/496  Respondent: 8587201 / Mrs Lucy Lines  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Thirdly, floating the vague idea of an A3 tunnel as a sop to local residents that infrastructure issues will be addressed is frankly insulting. The infrastructure needs to come FIRST not vague promises of looking at options which could easily fall away and require enormous sums in financing which the council can only dream of raising.

Fourth, have GBC councillors tried returning by car on the A3 from London in the evening rush hour? If they had, they would know that most nights there is a tailback from before the Burpham interchange even without any "incidents". To assume that thousands more cars can be accommodated in what is already gridlock defies logic and fact. How is bringing even more congestion to Guildford and surrounding areas to the benefit of residents? Oh I forgot, they will all use bicycles to get to work in London under the new Guildford transport corridor plan (sic.).

Fifth, GBC needs to stand up for its residents - they are after all supposed to be protecting their interests - against central government diktat. The NPPF is the most nakedly political planning law to ever be passed - its sole purpose to drive the economy via construction. Cameron and Osborne are out of the way now. Let us see some leadership from GBC and the councillors honouring their pledge that "the green belt is safe with us".

Finally, I attach a copy of an article I read in the local press which sums up my views perfectly. Rather than copy it out in my comments verbatim I attach it instead to save time.

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

Attached documents: 

IMAGE 3.png (293 KB)  
IMAGE 1.png (240 KB)  
IMAGE 2.png (321 KB)
<table>
<thead>
<tr>
<th>SANG</th>
<th>Location</th>
<th>Details</th>
</tr>
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<tbody>
<tr>
<td>SRN3, LRN7:</td>
<td>Highways projects at M25 Junction 10/A3 Wisley Interchange</td>
<td>Adjacency of Thames Basin Heaths SPA/Ockham &amp; Wisley Commons SSSI. Within BOA TBH06 Wisley, Ockham &amp; Walton Heaths; due sensitivity is necessary and projects should assist achievement of BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Heathland, Acid grassland).</td>
</tr>
<tr>
<td>SANG 4:</td>
<td>Tyting Farm</td>
<td>Within BOA ND02 North Downs Scarp &amp; Dip: Guildford-Mole Gap; SANG proposal should assist achievement of BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Chalk grassland, Beech &amp; yew woodland).</td>
</tr>
<tr>
<td>SANG 5:</td>
<td>Burpham Court Farm</td>
<td>Within BOA R04 River Wey &amp; tributaries; proposal must not impact existing ecological interest, and should assist achievement of BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Floodplain grazing marsh, Wet woodland and other wetland habitats).</td>
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<tr>
<td>SANG 6:</td>
<td>Russell Place Farm</td>
<td>Within BOA TBL01 Wanborough to Normandy Woods &amp; Meadows; proposal should assist achievement of BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows, Ponds).</td>
</tr>
<tr>
<td>SANG 7:</td>
<td>Ash, West of Ash Green</td>
<td>Partly within BOA TBL01 Wanborough to Normandy Woods &amp; Meadows/Ash Green Meadows SNCI; proposal must not impact existing ecological interest, and should assist achievement of BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows, Ponds).</td>
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<td>SANG 9:</td>
<td>Benswood</td>
<td>Within BOA TBL02 Clandon to Bookham Parkland; proposals should assist achievement of relevant BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Mixed deciduous woodland, Hedgerows, Ponds).</td>
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<td>SANG 10:</td>
<td>Blackwell Farm</td>
<td>Within BOA TBL01 Wanborough to Normandy Woods &amp; Meadows; proposal should assist achievement of BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows, Ponds).</td>
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<td>SANG 11:</td>
<td>Gosden Farm</td>
<td>Within BOA TBL02 Clandon to Bookham Parkland/Merrow Lane Woodland SNCI; proposal must not impact existing ecological interest, and should assist achievement of BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, Mixed deciduous woodland, Hedgerows, Ponds).</td>
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<tr>
<td>SANG</td>
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<tr>
<td>12:</td>
<td>Former Wisley Airfield&lt;br&gt;Within Wisley, Ockham &amp; Walton Heaths BOA/ Wisley Airfield SNCI, adjacent Thames Basin Heaths SPA &amp; Elm Corner Woodlands SNCI; proposal must not impact existing ecological interest, and should assist achievement of BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Heathland, Acid grassland, Arable field margins). The Trust reserves objection to use of the entire site as SANG, pending further impact analysis.</td>
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</tbody>
</table>
|      | **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**<br>**Attached documents:**

**Comment ID:** pslp173/122  **Respondent:** 8591041 / Surrey Wildlife Trust (Mike Waite)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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

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FRR Flood risk reduction: surface water mitigation measures (including FRR1 Minimising surface water flood risk at the strategic site at Gosden Hill; FRR2 Minimising surface water flood risk at the strategic site at Blackwell Farm). The Trust welcomes these infrastructure projects.

<table>
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<tr>
<td>8:</td>
<td>Land adjacent to Long Reach Farm, West Horsley&lt;br&gt;SANG proposal should assist achievement of relevant BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Meadows, Hedgerows, Ponds).</td>
</tr>
<tr>
<td>9:</td>
<td>Benswood&lt;br&gt;SANG proposal should assist achievement of relevant BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Mixed deciduous woodland, Hedgerows, Ponds).</td>
</tr>
</tbody>
</table>
SANG 10: Blackwell Farm
SANG proposal should assist achievement of relevant BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows, Ponds).

SANG 11: Gosden Farm
SANG proposal must not impact existing ecological interest, and should assist achievement of relevant BOA objectives (inc. protection, restoration & creation of Priority habitats, Mixed deciduous woodland, Hedgerows, Ponds).

SANG 12: Former Wisley Airfield
SANG proposal must not impact existing ecological interest, and should assist achievement of relevant BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Heathland, Acid grassland, Arable field margins). The Trust reserves objection to use of the entire site as SANG, pending further impact analysis.

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

Attached documents:

Comment ID: PSLPA16/438  Respondent: 8591169 / Michael Bruton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

j. I object to the failure in the Plan to consider infrastructure financing. There is a shortage of money for infrastructure which is controlled by Surrey County Council. SCC give no indication that they will fund the roads/schools infrastructure required. Neither does central government via the Highways Agency in terms of infrastructure improvement for the M25, A3, A31 and A281 which are Guildford’s traffic arteries.

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

Attached documents:

Comment ID: pslp173/783  Respondent: 8593537 / Normandy Parish Council (Leslie GA Clarke)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. Removal of Infrastructure Schemes AM4, BT4, EG6, FRR4, FRR5, LRNI8, LRN19, PED1, SANG 13, SED3, WCT5, WS4 and 0S4

We accept that the removal of Sites/Policies A46 and A47 has greatly reduced the need for these infrastructure projects, so in that respect we offer no objection to their removal as well. However, Normandy and Flexford have for many years suffered problems with traffic management and flood risk and these will continue to worsen, particularly if other developments proceed (10,000 homes are planned within a ten mile radius of Normandy). Please note that we will continue to press for improvements, but for the sole purpose of this consultation and the removal of A46 and A47, we support their removal from the Draft Local Plan.
Schemes SRN1 and SRN6 should be reinstated.

The addition of LRN23, LRN24, and LRN25 is supported.

The funding sources for many of the Local Road Schemes have been changed to 'Developer' only. The high authority, Surrey CC, is not proposing any schemes of its own. Is this due to a lack of funds, or a belief that nothing more is needed?

The addition of BT5 and BT6 is supported.

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

Attached documents:

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5. I object to the lack of immediate provision for new schools.

6. I object to the lack of any immediate provision for Doctors Surgeries.

I sincerely hope that this time around common sense will again prevail over the mercenary driving force that has once again been displayed by this second attempt. This version seems to be a rerun, with very little difference to the previous one that was publicly dismissed.

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

Attached documents:

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Comment ID: pslp173/647  Respondent: 8605889 / Surrey County Council (Sue Janota)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Appendix C Infrastructure Schedule - SED3

We welcome the amendments made to SED3 for the reasons stated above and we support the specification for the school to be located to the north of the site.

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

Attached documents:

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Comment ID: PSLPA16/4091  Respondent: 8606977 / Mrs Sarah Tipping  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

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

Attached documents:

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Comment ID: pslp173/432  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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

Appendix C

Infrastructure Schedule. We note the proposed road works, LRN25, being A281 Horsham Road/A248 Kings Road/A248 Broadford Road junction improvement schemes to be delivered between 2021 and 2023 by SCC at a likely cost of £2.5 - £5 million funded by the developer of Dunsfold Park. We have opposed the Dunsfold Park application due to the increased traffic volumes which will result throughout this parish and we would be likely to be opposed to these improvements if planning permission were to be granted after the Public Inquiry. We are opposed to any loss of Common land and believe that local residents will also be strongly opposed to the losses which would result from these proposed road improvements.

1. We support the views of Artington Parish Council that the B3000 to the east of Compton already operates well above its capacity and is subject to grid lock. This is exacerbated by the narrow humpbacked railway bridge which has barely room for the passing of the heavy goods vehicles which constantly use the B3000 between the A3 and Godalming or Guildford. It is disappointing that the opportunity has not been taken to improve this part of the road when the bridge is replaced in 2018 instead of simply replacing it with ‘like for like’ at the same width. Beyond the railway bridge the B3000 joins the A3100 at an extremely busy roundabout (Guildford Crematorium roundabout) which has frequent tail-backs.

2. The Shalford north map has a redrawn boundary of the Local Shopping Centre and this new boundary excludes 5 existing retail outlets along Kings Road to the east of the reduced new boundary. We believe that this primary shopping area should continue to extend along the Kings Road to the east as far as the Guildford Wine Shop. The reduction in the area will put the sustainability of the village at risk by limiting the Local Shopping Centre.

3. The Shalford south map now shows that the Open Space area is no longer subject to "assessment of village following insetting". This appears to be a positive clarification which we welcome.

4. In looking at any new developments we do not see, in Policy D4, that there is any policy on light pollution. This is a general national concern and Guildford Borough Council could take a lead by introducing some constraints
on light pollution for all new developments throughout the borough and perhaps look further to a policy on light pollution on existing properties. We have no further comments other than those previously submitted on the earlier version of 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: PSLPA16/1322  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/1263  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

22. APPENDIX C

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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: PSLPA16/415  Respondent: 8686913 / John and Susan Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
This Local Plan appears to be very similar to the last one with a little tinkering to the detriment of most residents in the area. I think the bullying tactic of “if we don’t put in for sufficient building the Government will demand the Council does more” is not the way for the Council to work with local residents.

I object to the proposed Local Plan:

1. I cannot understand how anyone can expect residents to agree with a plan that is only half written. How can you suggest the building of hundreds of properties without detailed mention of the infrastructure. The infrastructure in East Horsley is already under great stress – full roads, full schools, full medical centre, full car parks and poor water supply and drainage. Main roads are not the total infrastructure of the community.

I OBJECT because of the lack of “total” infrastructure.

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

Attached documents:

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Comment ID: PSLPA16/6  Respondent: 8707553 / Stuart Farquharson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. GBC want to double the size of the village but have made ZERO provision for infrastructure. Pure lunacy. We have a primary school that is 50 children over subscribed every year and growing. We have one bus service a day to Guildford. We have no public parking left at the railway station and a doctors surgery that cannot serve current residents. So where on earth does GBC expect the additional 1500 + residents to find said services…..There is NO infrastructure to support your ridiculous plan!!

6. There is no infrastructure to support the 500 proposed houses for Horsley. The roads are riddled with pot holes and we have very limited public transport. How on earth will the new residents get around.

The plan is a mess. Its sponsored by a political party who have completely ignored the wishes and views of the local community. The winners will be the developers and their share holders. The losers the natural habitat the villages.

Its an appalling mess.

Well done GBC!

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

Attached documents:

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Comment ID: PSLPA16/3589  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/778 Respondent: 8708545 / Nigel Wicks Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the reliance of the Plan (Policies SRN 2, 3, 9 and 10) on the change of responsibility for the provision of funds for infrastructure, especially transport infrastructure, to developers and public agencies such as Highways England and Surrey County Council. In the former case developer funding provision will undermine the requirement to provide forty percent affordable housing and in the latter case the budgets of such public agencies, both as to their quantum and allocation, are totally outwith the control of the Local Authority.

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

Attached documents:

Comment ID: PSLPA16/1165 Respondent: 8709249 / Geoff Spink Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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: PSLPA16/2249 Respondent: 8715777 / John Sansom Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

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

Attached documents:

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**Comment ID:** PSLPA16/4143  **Respondent:** 8717921 / Helen Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

13) I object to the fact that infrastructure planning for sites has not been properly addressed. There is a huge infrastructure deficit, no public funding available and developments will not fund the shortfall. Central government will not bail out Surrey County Council or Guildford Borough Council. Sites which will rely on the private car must be excluded from the local plan. Unrealistic transport plans put forward by developers need to be scrutinised thoroughly and exposed for the misleading documents that they are. Surrey County Council has told me that they do not have sufficient resources to critique these applications/policies properly and this is totally unacceptable.

[...]

18) I object to the fact that there is no tolerance planned at all for accidents, roadworks etc on the SRN which already impact local roads often resulting in gridlock. I am mindful that recent guidance from the Parliamentary Select Committee on Transport published on 30th June 2016 condemning the use of hard shoulders for permanent running [see http://www.parliament.uk/business/committees/committees-a-z/commons-select/transport-committee/news-parliament-2015/all-lane-running-report-published-16-17/]. For the avoidance of doubt, hard shoulder running is a large part of the planned increased capacity on the M25 southwest quadrant – the costs of adding capacity without using the hard shoulder option is not funded and is unlikely to be properly funded in the near term particularly following the result of the recent Referendum.

[...]

32) I object to the proposed Strategic SANG allocation at Long Reach, West Horsley as it “supports” the development of close to 1000 additional homes.

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

Attached documents:

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**Comment ID:** PSLPA16/968  **Respondent:** 8726529 / Eric Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. **APPENDIX C**

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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: PSLPA16/1044  Respondent: 8726529 / Eric Palmer  Agent:

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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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: PSLPA16/1615  Respondent: 8731649 / Ian Slater  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: PSLPA16/3416  Respondent: 8732993 / Michael Weber  Agent:

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

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

Attached documents:

Comment ID: PSLPA16/3741  Respondent: 8732993 / Michael Weber  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule 
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: PSLPA16/3126  Respondent: 8735873 / David and Gillian Allan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule 
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: PSLPA16/1286  Respondent: 8741377 / Lisanne Mealing  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/1090  Respondent: 8744161 / Michael Bridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/1094  Respondent: 8744257 / Mary E Bridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/2201  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/366  Respondent: 8747169 / David Fassom  Agent: |
|--------------------------|---------------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule |
| 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: PSLPA16/2951  Respondent: 8749473 / Charlotte Beckett  Agent: |
|--------------------------|---------------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule |
| 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: PSLPA16/531  Respondent: 8749761 / Matthew Darby  Agent: |
|--------------------------|---------------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule |
| 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 the proposed redevelopment of the Howard of Effingham and the proposal to build 445 houses in order to fund that redevelopment.

• A new school building should not be contingent on the wholesale loss of the greenbelt that was specifically designed to halt villages becoming joined into an urban sprawl. This development will effectively merge Effingham and Bookham into an urban conurbation.
• Schools should be funded through taxation and not used as a vehicle for profit
• The plan calls for the demolition of St Lawrence to allow for more houses - this school is a vital part of the village; its destruction in the name of profit would be shameful. GBC should remember that it represents the residents of the borough and not the interests of the private sector.

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:** PSLPA16/4026  **Respondent:** 8772801 / David French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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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:** PSLPA16/380  **Respondent:** 8776417 / Nici Holland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

10. I am unhappy about the proposed highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. Improvements and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any road improvements are in place. Transport cannot be an afterthought. The proposed sites are often miles from the nearest railway station. Bus services even in the largest villages are almost non-existent and rural buses are too slow anyway for busy people. Many roads flood badly and have no footpaths making walking an dangerous option. The proposed permanent road closures and diversions will create longer journey times and increase the carbon footprint which is becoming increasingly bad with the number of vehicles using Ockham Road.

I hope you will give careful consideration to the draft proposal before leaping in and enabling irreversible change when other areas can be explored first.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/4129  **Respondent:** 8787969 / K Britton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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:** PSLPA16/3982  **Respondent:** 8794753 / Andrew Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

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**Comment ID:** PSLPA16/889  **Respondent:** 8796673 / Suzanne Burroughs  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/4124  Respondent: 8798753 / Jane Reeves Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Stronger assurances should be included in the plan that development can only commence when required infrastructure improvements have been secured.

The A247 through Clandon is overburdened already with excessive heavy traffic.

It is unsuitable as an A road in the first place since it has, in the Village three pinch points so narrow as to prevent two lorries to pass each other. Lorries regularly mount the pavement at speed already. Any plan should include proposals to provide other traffic routes away from the A247.

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

Comment ID: PSLPA16/4126  Respondent: 8798753 / Jane Reeves Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/1751  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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**Site 110. Broadstreet and Backside Common. SANG**

Commons are already publicly available land. The public have the right to walk over the commons via s193 of the Law of Property Act 1925 and the CROW Act (Countryside and Rights of Way) 2000. It is, therefore, inappropriate to designate the commons as SANG as it does NOT provide any new additional recreational space.

We do not want artificially contrived SANGs when we already have natural common land.

Natural England’s report NECR136 para 3.58 dated 13 February 2014, indicates that there is no evidence to suggest provision of a SANG reduces the number of visitors to the SPA. Contrary to the NPPF – para 118.

Rather than providing numerous SANG sites, policy constraints should be applied to the SHMA – the figure of 652 houses per year needs to be reduced in recognition of the planning constraints in Guildford (Green Belt, SPA, SSSI, SNCl, infrastructure deficiencies)

**Site 112. Russell Place Farm.**
This land is good quality agricultural land. It is currently used for grazing cattle. With the proposed increase in population in the South East there is greater pressure on food resources so we need to protect our ability to provide food and crops for this country.

The land abuts Broadstreet and Backside Common and therefore is an inappropriate and unnecessary place to site a SANG. We do not want artificially contrived SANGs when we already have natural common land nearby.

The public already has access to this field because of existing footpaths.

Rather than providing numerous SANG sites policy constraints should be applied to the SHMA – the figure of 652 houses per year needs to be reduced in recognition of the planning constraints in Guildford (Green Belt, SPA, SSSI, SNCI, infrastructure deficiencies)

**Site 113. Stringers Common. SANG**

Commons are already publicly available land. Residents have the right to walk over the commons via s193 of the Law of Property Act 1925 and the CROW Act (Countryside and Rights of Way) 2000. It is, therefore, inappropriate to designate the commons as SANG as it does NOT provide any new additional recreational space.

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**Site 118. Land adjoining Fairlands. Safeguarded**

This land is located within the Green Belt and meets the following purposes of the Green Belt which are to: check the unrestricted sprawl of large built-up areas; to prevent the coalescence of Fairlands with the town; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of our historic town. Very special circumstances would be required to justify the loss of such sites given their proximity to Whitmoor Common SPA, SSSI, LNR.

The safeguarded land could provide for just over 500 houses and two traveller pitches almost doubling the existing size of this satellite suburb and would completely change the character of Fairlands leading to the urbanisation and destruction of the village environment.

The local road network is already at capacity. The A323 experiences significant delays during the rush hour with a particular pinch point at Rydes Hill roundabout. These delays represent a significant loss of income in terms of the local economy. The cumulative impact of development in Aldershot, Farnborough, Ash, Tongham, Normandy and Pirbright will greatly exacerbate the existing problems.

Any development at Fairlands would increase vehicle movements on the A322 which would have a detrimental impact on air quality which in turn would have a detrimental impact on Whitmoor Common, SPA, SSSI, LNR.

C15, the road that runs through Wood Street Village, which is already used as a rat run to the Research Park, University, Hospital and Tesco is at capacity. Any development at Fairlands would have a knock-on impact on the traffic using the road through Wood Street Village.

Both Wood Street Infant School and Worplesdon Primary School are already oversubscribed – the proposed expansion of Worplesdon Primary School to 540 places will only address the existing need. St Joseph’s has been expanded and Stoughton Infants is being expanded to deal with existing need.
Whilst primary school places are being increased at St Joseph’s School, Aldershot Road to take account of current demand, there will also need to be an increase in senior school places. The proposed site in Salt Box Road is inappropriate.

There is only one way in and out of the Estate. There is a significant increase in the volume of traffic entering and leaving the Estate during school drop off and collection times. The road network within the Estate could not possibly cope with the increase in traffic that a new development would bring.

The existing sewerage system cannot cope – major sewage leaks have been experienced on Broad Street Common (SNCI) twice in the last 12 months. On days when there is sudden, heavy rainfall raw sewage leaks into the gardens in St Michael’s Avenue.

The water table in this area is very high, whilst the land itself is low lying. Surface water flooding in Fairlands is an issue that is recognised within the Surrey Flood Risk Strategy and the Guildford Surface Water Management Plan. Any additional development would make the risk of household flooding worse.

Fairlands is located at the end of a particularly long power transmission network. Due to overhead lines and the length of the network the Estate suffers from frequent power outages. We do not believe that the existing network could cope with a housing development here.

Such a development would have a detrimental impact on Littlefield Common SNCI, which provides habitat for a number of protected species including nightjars and bats.

This particular land contributes to a vital wildlife corridor which links Whitmoor Common SPA/SSSI, Chitty’s Common, Rydes Hill, Common, Broad Street and Backside Commons to the Hogs Back AONB.

There are remnants of the cultural landscape associated with the medieval Royal Deer Park within the Rydes Hill/Fairlands rural-urban fringe. It is important that the separation of Fairlands from the historic settlement of Wood Street Village is maintained. Large scale development at this location would be wholly inappropriate.

There is an existing problem with the no right turn out of the Estate being abused. Any increase in the number of vehicles using the entrance would correspondingly increase the risk of a serious or even fatal accident occurring on the A323.

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: PSLPA16/1176</th>
<th>Respondent: 8827777 / Mary English</th>
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POLICY 11 AND APPENDIX C – INFRASTRUCTURE AND DELIVERY

As anyone who driven on the roads around Guildford in peak times can see, the cumulative effect of the additional traffic generated by the developments in draft Local Plan will be to increase congestion even with the proposed highway schemes in place. I therefore dispute the conclusion that the developments would have ‘an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’. The mitigation proposed is not sufficient to overcome the problems that would be caused by the growth anticipated in the draft Local Plan. Congestion
would only worsen; the network would lack resilience and be vulnerable to disruption due to incidents; and minor roads would have to cope with a lot more traffic for which they are wholly unsuitable.

I therefore object to this policy since the additional traffic generated by the proposed developments would increase traffic congestion to an unacceptable level.

POLICY I 3 AND APPENDIX C - SUSTAINABLE TRANSPORT FOR NEW DEVELOPMENTS

The proposals that I have seen are likely to cause grid lock in Burpham if Gosden Hill Farm is developed as proposed. It would only increase traffic congestion as the roads to be used cannot take cycle and bus lanes in the way proposed without having a detrimental effect on vehicle movements due to the narrowness of the roads that it is proposed would be included. Vehicles that would still need to access the town centre would suffer serious delays.

I therefore object to the proposed development of the Sustainable Movement Corridor as it is neither cost effective and nor is it realistic to expect the corridor to deliver the benefits described.

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

Attached documents:
'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). (Some existing buildings already reach 5-7 levels in height).

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

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Attached documents:

Comment ID: PSLPA16/4394  Respondent: 8879969 / Robert & Tracey Butcher  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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There is no evidence provided in the local plan information to suggest that the significant investment to increase the capacity of services such as drainage and infrastructure has been planned for.

Clear and sustainable improvements to the local infrastructure and facilities need to be put in place through the Local Plan to demonstrate that the Council can manage the impact of these new sites to allow them to be fully supported.

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

Attached documents:

Comment ID: PSLPA16/1691  Respondent: 8881345 / Lynne Ground  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/2758  Respondent: 8881537 / Jean Baptist  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/1430  Respondent: 8883841 / Pamela French  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

17. I OBJECT to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/4013  Respondent: 8883841 / Pamela French  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Comment ID: PSLPA16/1179  Respondent: 8892673 / Nick Forwood  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
15. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/2195  Respondent: 8892737 / David Eagle  Agent:

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: pslp173/429  Respondent: 8893697 / Gill Woolfson  Agent:

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

I object to the removal of LRN19.

3,850 new homes are being built as part of the Aldershot Urban Extension, a further 1,200 at the Princess Royal Barracks at Deepcut and at least 1,870 homes in Ash and Tongham. All these homes are all being marketed as suitable for people who work in Guildford. The result will be excessive pressure on the A31 and A323 at all times.

In addition, the A31 will have a new signal controlled exit route from site A26, Blackwell Farm. It would seem that the proposed road bridge at Ash level crossing, site A30, on the A323, has been removed from the Plan. This is a significant bottleneck.

The A31 is already congested at both peak and normal times and the new signal controlled junction at Blackwell Farm will make the congestion worse. The A323 is congested at peak times. Normandy and Worplesdon are facing traffic blight, gridlock at peak times, and increased levels of pollution and noise. Even a small road improvement such as LRN19 should be kept, anything that might help even a little.

On a personal note, it is becoming harder to turn out of Bailes Lane into the Aldershot Road at busy times. I fear it may become impossible.
I would have liked to have seen some strategic thinking about how the road infrastructure to the west of Guildford could be improved to handle the increased traffic from these large developments. Currently there appears to be no mitigation at all in the Guildford Borough Council jurisdiction.

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

**Attached documents:**

---

**Comment ID:** PSLPA16/2924  **Respondent:** 8896097 / Andrew Fordham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

22. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

**Attached documents:**

---

**Comment ID:** PSLPA16/2608  **Respondent:** 8896929 / Desmond Finnan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the suggestion of “traffic managing” in the Horsley area as with maybe 5000 more cars on the local roads we need full access to all the present roads to spread the traffic over the whole area not funnel everyone down the same route.

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

**Attached documents:**

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**Comment ID:** PSLPA16/3334  **Respondent:** 8899617 / Claire Nix  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**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:
c) The infrastructure is already under great strain, and this further demand on resources is likely to lead to complete breakdown in some areas. We already have little or no spare capacity in schools and doctor’s surgeries. There is often no parking space at Horsley station now, and when longer trains are available to accommodate these extra people travelling, there will not be sufficient parking space for them. What about the provision of utility supplies, water, power, drainage, broadband & telephony? Local roads are dangerously overused by traffic such as heavy trucks and buses for which the roads were not designed. Additional road traffic is likely to lead to health and safety issues. Who is going to pay for all these improvements? Guildford Borough Council (us, in other words)?

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

Attached documents:

---

22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

**Attached documents:**

---

**Comment ID:** PSLPA16/3596  **Respondent:** 8904129 / Elizabeth Ross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

**Attached documents:**

---

**Comment ID:** PSLPA16/1122  **Respondent:** 8904673 / Colin Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**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 the proposed Infrastructure Schedule (Appendix C)

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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:** pslp173/153  **Respondent:** 8904673 / Colin Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/2861  Respondent: 8905249 / J.D. Wisden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

The people of East and West Horsley do not want development of this magnitude in our villages. We enjoy the peace and quiet of our villages and do not want any further traffic along our roads, causing further congestion.

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

Attached documents:

Comment ID: PSLPA16/3602  Respondent: 8905537 / Christopher Ross  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Attached documents:

Comment ID: PSLPA16/3587  Respondent: 8906273 / G Baptist  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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:** PSLPA16/2315  **Respondent:** 8906305 / Anne Fort  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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:** PSLPA16/2250  **Respondent:** 8907393 / Helen Cannon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

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

**Attached documents:**

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**Comment ID:** PSLPA16/4500  **Respondent:** 8909761 / Diana Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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>
<tr>
<th>Comment ID: PSLPA16/3834</th>
<th>Respondent: 8914177 / J.V. &amp; H.P. Brown</th>
<th>Agent:</th>
</tr>
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</table>

Transport (road, rail and parking), medical, educational and shopping facilities are already under strain. Increased volumes of traffic that would arise from the proposals have the potential to generate considerable hazards to local schools, pedestrians and junctions not least increasing pollution levels. The Raleigh School is oversubscribed and the Medical Centre is inundated. The addition of a significant number of new dwellings to the area would be unsustainable.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3204</th>
<th>Respondent: 8919009 / Andrew Kukielka</th>
<th>Agent:</th>
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<th>Comment ID: PSLPA16/2882</th>
<th>Respondent: 8921377 / Paul Maycox</th>
<th>Agent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3136  **Respondent:** 8921569 / Steven Cliff  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

For each of the Key Allocated Sites in the borough, the Infrastructure Schedule identifies infrastructure projects that are required. However, Garlick’s Arch (A43) is not mentioned and it is therefore clear that the Plan takes no account of the infrastructure required for this site. The Plan is simply not fit for purpose in this regard.

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

Attached documents:

**Comment ID:** PSLPA16/3206  **Respondent:** 8921857 / Claire Kukielka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**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:** PSLPA16/1439  **Respondent:** 8924577 / Charles Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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<tr>
<th>Comment ID: PSLPA16/204</th>
<th>Respondent: 8926657 / Lian Grieves</th>
<th>Agent:</th>
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<tbody>
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12) I OBJECT to the lack of any sensible provision for new schools.

13) I OBJECT to the lack of any realistic provision for doctor's surgeries.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2793</th>
<th>Respondent: 8928033 / P. Richardson</th>
<th>Agent:</th>
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<th>Comment ID: PSLPA16/2858</th>
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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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In policies SRN9 and SRN10 I note the change in responsibility for delivering new A3 slip roads at Burntcommon from Surrey County Council to either Highways England or developer. I have concerns that if delivered by Highways England alone there would be no local level control over if/when/how the scheme was delivered. This is an existing concern for other schemes including SRN2 and SRN3 (Stoke interchange and M25 J10/A3 interchange), where Highways England have sole responsibility.

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 our 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:

Comment ID: PSLPA16/2092  Respondent: 8933185 / Peter See  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Pages 276-301 Appendix C. Infrastructure Schedule
Likely cost: Probable cost

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

Attached documents:

Comment ID: pslp173/297  Respondent: 8933537 / Annie Ladd  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
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: PSLPA16/4165  Respondent: 8940225 / Glen Ruddy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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:

14. I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope.

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

Attached documents:

11.0 APPENDIX C: INFRASTRUCTURE SCHEDULE

11.1 At this stage of the planning and delivery process, the costings set out against many of the infrastructure projects in Appendix 3 are broad and provisional estimates. MGH intends to provide a more detailed response upon completion of its further work prior to the Examination of the Local Plan.

11.2 MGH is committed to the delivery of all necessary infrastructure to support the development of Gosden Hill and will continue to engage with GBC, SCC and other delivery bodies to review the Infrastructure Schedule provided at Appendix C of the Local Plan and seek to agree costs and funding sources.

11.3 We understand that GBC has yet to finalise its approach to introducing a Community Infrastructure Levy (CIL). Specifically, it has yet to be determined whether a CIL liability will apply to the development of strategic sites identified within the Local Plan. GBC is also yet to publish an up-to-date draft Regulation 123 List, a CIL Draft Charging Schedule, or confirm how Section 106 requirements and associated policies will be scaled back to those matters that are directly related to a specific site.

11.4 Specifically, Appendix C cites a range of infrastructure as being specific to the delivery of Gosden Hill and makes reference to various projects being ‘developer funded’ or the costs being met by ‘developer contributions’. Where necessary to make the proposals acceptable in planning terms, it would be appropriate for such infrastructure to be secured via Section 106 / Section 278 (or appropriate conditions). Wider, strategic infrastructure necessary to deliver the Local Plan would conversely hold the potential to be funded via CIL receipts (and other funding sources).
11.5 It remains unclear, at this stage, how the introduction of a CIL regime by GBC will influence the procurement and delivery of site-specific infrastructure associated with Gosden Hill and wider delivery of strategic infrastructure to support the Local Plan.

11.6 Furthermore, it is unclear whether the infrastructure items identified within Appendix C as being associated with Gosden Hill, and earmarked for payment or delivery by MGH, are in fact wholly and directly related to the development (i.e. ‘site-specific’).

11.7 It is important that greater clarity is provided by GBC with respect to the division between ‘strategic’ and ‘site-specific’ infrastructure. The associated legislative restrictions regarding funding (via CIL or Section 106 / Section 278) must be appropriately reflected within the emerging CIL regime and in accordance with emerging Local Plan policies. Careful consideration must also be given to the financial burden placed on the delivery of the strategic sites by costs associated with both strategic and site-specific infrastructure. This should be addressed via robust viability testing as part of the emerging CIL evidence base, and thoroughly considered by GBC as it progresses towards adopting a CIL Charging Schedule (with consultation understood to be due in October 2016).

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp173/415</th>
<th>Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)</th>
<th>Agent: Barton Willmore (Michael Knott)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule</td>
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**Infrastructure Delivery Plan**

**NR3 - Merrow Station (Guildford East)**

The Guildford East (Merrow) Railway Station, as identified in the Surrey County Rail Strategy (September 2013), is a long standing aspiration of sec and would provide benefits to existing local residential and employment areas, as well as Gosden Hill. Furthermore, it will form part of a transport hub at the end of the Sustainable Movement Corridor.

The station is an aspiration of sec and GBC and provides strategic benefits to local residents and employment at the Merrow Business Park and Merrow Depot. Clearly, a significant financial contribution will be secured through the development of Gosden Hill to help fund the delivery of the station together with the provision of land within our client's ownership necessary to help deliver the station and associated facilities.

However, to reflect the position summarized above, the text "to principally serve Gosden Hill Farm" should be deleted and the wording relating to its delivery modified, to read as follows:

**Infrastructure Project: NR4 New rail station at Guildford East (Merrow)**

**Delivered by: Network Rail, Surrey County Council and developer(s)**

**SRN4 - New and Relocated Southbound A3 Slips**
Not only will the improved A3 / A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on slip provide access to the Gosden Hill development, it will also provide benefits to the local and strategic road network, including a reduction in 'drive through' trips, as well as providing an access to the Park and Ride at Gosden Hill, which is another strategic infrastructure project.

In respect to SRN4 the following amendments should be made:

**Improved A3/ A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on slip (to serve Gosden Hill Park and Ride, Gosden Hill and provide local and strategic road network benefits).**

**LRN6 Interventions to Address Potential Highway Performance Issues**

Interventions to highway deliver capacity improvements associated with Gosden Hill will be designed so as to take account of all users and the provision of the identified sustainable movement corridor (SMC6).

Given the wide range of improvements which could be provided, alongside the fact that some interventions may be delivered alongside SMC6 improvements it is anticipated that some local interventions would be delivered by SCC as the Local Highway Authority.

As such, the delivery agent for LRN6 should include sec and not be limited to Highways England and/or developer. This would be in line with other 'LRN' schemes identified within the Infrastructure Delivery Plan.

**P&R 1 - Park and Ride**

A Park and Ride at Gosden Hill would provide benefits to existing local residential and employment areas, as well as Gosden Hill, whilst removing a significant number of trips from the local and strategic road network. Furthermore, it will form part of a transport hub along the sustainable movement corridor.

The text 'to principally mitigate traffic impact of Gosden Hill Farm site' should be removed, as the Park and Ride forms part of the strategic transport interventions to deliver the Local Plan overall.

**BT5 - Bus Network**

The delivery of housing at Gosden Hill provides an opportunity for existing bus routes to be strengthened and for new routing opportunities and modern public transport opportunities to be realised.

Either clarity should be provided on what constitutes a 'significant bus network' or BTS should be amended to read:

**Provide access to the public transport network, including the potential opportunities to serve the site via local and demand responsive bus services linking the site with key destinations including the existing suburbs of Guildford and the town centre.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<td>I object to the fact that infrastructure planning for sites has not been properly addressed. There is a huge infrastructure deficit, no public funding available and developments will not fund the shortfall. Central government will not bail out Surrey County Council or Guildford Borough Council. Sites which will rely on the private car must be excluded from the local plan. Unrealistic transport plans put forward by developers need to be scrutinised thoroughly and exposed for the misleading documents that they are.</td>
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<td>I object to the proposed Strategic SANG allocation at Long Reach, West Horsley as it “supports” the development of close to 1000 additional homes.</td>
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<td>6. There has been no planning in conjunction with the local healthcare providers in relation to the proposed increase in demand activity that 14000 new homes would bring to the area. This has not been discussed regarding the service provision plan.</td>
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<td>7. There will be a lack of school places in the area, which are already oversubscribed.</td>
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APPENDIX C AND TOPIC PAPER ON TRANSPORT

I OBJECT TO THE REMOVAL OF THE BEECHCROFT DRIVE SCHEME SRN6 FROM THE DRAFT LOCAL PLAN

We were not given an opportunity to comment on this earlier. There is an important omission to the 2017 Draft Local Plan. The 2003 Local Plan included a clause to explore ways of improving the access of Beechcroft Drive. 14 years later nothing has been done and conditions on the A3 have deteriorated to an even greater degree due to the increase in traffic as a consequence of the Hindhead Tunnel.

KEY EVIDENCE
Currently residents, visitors and service providers such as recycling trucks, food delivery etc leaving Beechcroft Drive risk their lives by driving into head-on traffic, from a standstill, on a motorway” with virtually no gaps, with at least 15,000,000 car movements per year, on a blind corner, with most of the traffic speeding beyond the 50mph limit from 6am till late at night. Entry to the Drive on the Northbound carriageway is no better as it is necessary to slow down to 10-20 mph to take the 45 degree switch-back to turn into the Drive safely. This puts A3 drivers, especially if they have lost concentration, at risk of shunting, which has happened on a number of occasions.

Road rage and harassment
Despite a large sign which only lights up if drivers are speeding and the coloured road, drivers on the A3 cannot believe we would make such manoeuvres on a Strategic Road Network and as a consequence, we are experiencing high levels of road rage and harassment.
This happens both entering and exiting the Drive. Here are some examples -
• Residents regularly experience abusive car horns
• 2 residents entering the Drive have been chased by drivers to their houses with fists raised
• 3 mothers travelling with their children in their cars have had drivers tail gating or even worse driving alongside almost mirror to mirror to terrify all the occupants.
• I have had the latter experience on two occasions and one driver tail gaged and then drove alongside blowing his horn as he did so! These experiences have left me traumatised, white and shaking.
• Another mother with her children in the car had the experience of a car overtaking, cutting in front of her and then putting his breaks on.

Safety
It is obviously not safe for all parties. But the harsh reality is that when accidents involving residents happen they are blamed for performing a dangerous manoeuvre on a dual carriageway. I always wait until there is no traffic coming round the corner before exiting Beechcroft brive and therefore can wait up to 15-20 minutes to get out. However with this margin of safety, the oncoming traffic will be on my back within seconds, even if drivers are travelling within the correct speed limit. Another experience which many residents have had is drivers swapping lanes from the fast lane without indicating. This has happened to me twice and it is nothing short of a miracle that I have managed to avoid a collision. This is dangerous for both residents and drivers on the A3.

Under Health and Safety because it is considered such a danger taxis are now reticent to drop off a visitor or resident. For their safety many visitors to Beechcroft Drive are parking on the other side of the A3 and walking across the footbridge

One disabled lady has had to give up her car and another elderly couple have had to return home on a number of occasions because they could not get out.

Disability Discrimination
In 5.19 of the topic paper on Transport there is mention of the requirement to maximise opportunities for people with disabilities to access all modes of transport. The elderly and the severely handicapped cannot get their Dial a Ride facilities because it is considered unsafe for the driver and occupants of the bus. With the distance to get to public transport and its limited service, this makes them prisoners in their own home.

In the last 2 years the volume of traffic has increased dramatically and because of the increased levels of traffic, residents are having to take greater risks in order to get to or from their homes. It is now well known that Guildford is the most congested town in the whole of Great Britain.

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

Attached documents:
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/2869  Respondent: 8979265 / Rachel Taylor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

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Comment ID: PSLPA16/4389  Respondent: 9078881 / Jean Trickett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the 2016 Draft Local Plan as follows:-

1. LACK OF A DETAILED PLAN FOR IMPROVING THE ESSENTIAL INFRASTRUCTURE

This is key to ANY future development and yet there are no detailed plans for improving the infrastructure contained in the Draft Local Plan. This should come before any building and most importantly should include a TUNNEL which would need to be constructed before any redevelopment of Gosden Hill could EVEN BE CONSIDERED.

If a tunnel is not built then nor should ANY new houses be built on any of the following sites:-

- Gosden Hill
- Send
- Garlick's Arch
- Ripley
- The Horsleys
- Wisley Airfield*

---
THE 4-WAY JUNCTION PROPOSAL FOR BURNT COMMON WOULD DO NOTHING TO ALLEVIATE THE TRAFFIC CONGESTION BETWEEN RIPLEY AND THE SOUTH SIDE OF GUILDFORD, EITHER ON THE A3 OR IN THE TOWN CENTRE.

* Why is Wisley still included in the Draft Plan even though GBC councillors turned down the latest application???

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4529</th>
<th>Respondent: 9079393 / Wisley Property Investments Ltd.</th>
<th>Agent: Savills (Charles Collins)</th>
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**Infrastructure Schedule – Appendix C**

3.147. Object (not effective nor justified in respect of NPPF paragraph 182)

3.148. WPI does not wish to make extensive comments on the proposed infrastructure schedule, as outlined in Table 3.2, the majority of the planned infrastructure provision is supported. WPI questions the evidence base and scope for the delivery of certain items.

3.149. AM3 (off-site Cycle Network) – In accordance with WPI’s comments with respect to the draft allocation A35, the infrastructure provision should be deleted.

3.150. SED2 (Secondary Schools) – The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be determined

3.151. ES1 (Police Infrastructure) – Neighbourhood policing centre to be potentially accommodated in conjunction with other community space provision. Delete reference to size.

3.152. HSC4 (GPs and Dental Surgeries) – Replace “GP surgery with pharmacy” with “appropriate healthcare provision, potentially including GP surgery with pharmacy”.

3.153. BT2 (Bus Interchange at Effingham Junction) – Make clear that a bus interchange could be provided in Horsley village, in close proximity to the station.

3.154. WS1 (Water Supply) – Procurement of new water supply (including reinforcement of existing) and contributions by developers are controlled by mechanisms within the Water Industry Act 1991. Developer contributions are generally offset against future revenue.

3.155. WCT1 (Wastewater connections and treatment) – “Procurement of new sewerage (including reinforcement of existing) and contributions by developers are controlled by mechanisms within the Water Industry Act 1991. Developer contributions are generally offset against future revenue.

3.156. WCT2 (Wastewater connections and treatment) – Sewage treatment capacity should be provided by Sewerage Undertakers for the planned development in the STW catchment. Any necessary upgrades are normally funded by the Sewerage Undertaker through the AMP process agreed with Ofwat every five years.

**Changes Sought**

3.158. AM3 (off-site Cycle Network) – The infrastructure provision should be deleted.

3.159. SED2 (Secondary Schools) â€“ The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be ‘determined’

3.160. ES1 – Neighbourhood policing centre to be potentially accommodated in conjunction with other community space provision. Delete reference to size.

3.161. HSC4 – Replace “GP surgery with pharmacy” with ‘appropriate healthcare provision, potentially including GP surgery with pharmacy’.

3.162. BT2 – Make clear that a bus interchange could be provided in Horsley village, in close proximity to the station.

3.163. In addition, consider whether infrastructure measures WS1, WCT1, WCT2 and FRR3 are required in the GBLP.

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

Attached documents:

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**Comment ID:** pslp173/678  **Respondent:** 9079393 / Wisley Property Investments Ltd.  **Agent:** Savills (Jim Beavan)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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

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<tr>
<th>Policy/ Section / page / para</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>Appendix C: Infrastructure Schedule</td>
<td>A note should be made that all “likely cost” entries are indicative estimates. AM3 (off-site Cycle Network) – In accordance with WPI’s comments with respect to the draft allocation A35, the infrastructure provision should be deleted. SED2 (Secondary Schools) – The policy wording should be amended to require a re-assessment of secondary education needs at the time that the application is to be ‘determined’.</td>
<td>There is no note included referring to “likely costs”. However, the column now refers to the costs “where known”. The requested change for AM3 is not made. However, costs are now stated as £6.5m (p320). The requested change to SED2 is made. There are also additional charges included.</td>
<td>Additional of “where known” is a Welcome change. However, WPI still considers that many of the costs are estimates. Change to AM3 are noted. The Local Plan should make policy provision for developers to make fair and reasonable off-site cycle contributions. WPI Welcome the change to SED2.</td>
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<tr>
<td>Comment ID: PSLPA16/2262</td>
<td>Respondent: 9094497 / Janet Stiles</td>
<td>Agent:</td>
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APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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<tr>
<td>10. I object to the proposed Infrastructure Schedule (Appendix C)</td>
<td>The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.</td>
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<tr>
<td>More traffic, more pollution for a village that is already struggling along with The extra people needing the medical centre that is full to capacity and school places, limited travel from our rural bus service and few shops surely is not ideal. All the above needs addressing most importantly the road infrastructure.</td>
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I object to the lack for immediate provision for new schools
I object to the lack of any immediate provision for Doctors surgeries

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

Attached documents:

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Comment ID: PSLPA16/2264  Respondent: 10616321 / Petrina Jeffreson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

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

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Comment ID: PSLPA16/3049  Respondent: 10619169 / Wendy Critchlow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

---

Comment ID: PSLPA16/2333  Respondent: 10620801 / E. H. and J. A. Strange  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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 any immediate provision for new schools
I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/2607  Respondent: 10620801 / E. H. and J. A. Strange  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools, the lack of any immediate provision for Doctors Surgeries.

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

Comment ID: PSLPA16/2688  Respondent: 10633761 / Guida Esteves  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

7. I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Comment ID: PSLPA16/183  Respondent: 10634465 / Peter Stratford  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

LRN9 to LRN13 inclusive will not address and mitigate the increased traffic flows forecast by SCC’s OGSTAR (Jan 2014) under Scenario 7. The A323 Guildford Road is already stationary in the morning and evening peak. LRN21 is welcome, but it will only transfer the problem in the morning peak eastwards towards Normandy.

LRN19 won't convert Westwood Lane from an unlit rural lane with an uncontrolled one way constriction under the single lane railway bridge into an urban road taking traffic from the proposed Policy A46 new 1100 home "village" onto the A323 or A31. Furthermore, no upgrade is proposed for Glaziers Lane on the other boundary of the proposed Policy A46 development.

FRR5 won't address the flood risks associated with the site of the proposed Policy A46 new village. This is on the spring line of the Hogs Back and the ground is saturated for much of the year. It is unclear if the foul sewer network connecting back to the nearest sewage farms will support all the additional sewage created by Policy A46.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/3827  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the 2016 Draft local Plan as it has paid no regard to the additional schools that will be required or the increase in General Practitioner or hospital services. This alone makes the plan unsustainable.

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

Comment ID: PSLPA16/3823  Respondent: 10643073 / C Prowse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Every morning the A3 experiences heavy traffic from the services to the M25. These developments will add considerable traffic (even more with a new junction at Burnt common). To propose these large developments without any roads is naive and short sighted.

Schools and health services in this area are full, where is the proposal for more schools and health centres?

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

Comment ID: PSLPA16/2072  Respondent: 10643457 / Burpham Neighbourhood Forum (Catherine Hughes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Building development is aiming for 2021 and a tunnel for 2023-2027. Surely the tunnel comes first before putting housing in its way. This development between Burpham and Clandon will double the size of Burpham. We already have excessive traffic problems; this development has nothing to show its infrastructure will avoid or improve this.

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

Comment ID: PSLPA16/475  Respondent: 10646753 / Jenny Mackenzie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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 evidence for the alleged housing need numbers
I object to the lack of immediate provision for new schools
I object to the lack of any immediate provision for doctors surgeries
I am horrified at these proposals and have written to my MP Sir Paul Beresford because the Conservatives had an election MANDATE to SAVE the GREEN BELT

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

Attached documents:

Comment ID: PSLPA16/1172  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

17. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/1471  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/3280  Respondent: 10701537 / Ben Gamble  Agent:
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1135</th>
<th>Respondent: 10717985 / Alison Drennan</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</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>
<tr>
<td>1. I object to the lack of any immediate provision for new schools or GP surgeries.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1136</th>
<th>Respondent: 10717985 / Alison Drennan</th>
<th>Agent:</th>
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<tr>
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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></td>
</tr>
<tr>
<td>1. I object to the failure of GBC to consider and address infrastructure requirements when proposing an excessive, unnecessary and disproportionate increase in the housing for Send.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4408</th>
<th>Respondent: 10722049 / Richard Smith</th>
<th>Agent:</th>
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<tr>
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<tr>
<td>1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)</td>
<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s</td>
<td></td>
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I object to the proposed Infrastructure Schedule (Appendix C). There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

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

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<tr>
<th>Comment ID: PSLPA16/2795</th>
<th>Respondent: 10723553 / Judith Pound</th>
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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: PSLPA16/4056</th>
<th>Respondent: 10723553 / Judith Pound</th>
<th>Agent:</th>
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</tr>
</tbody>
</table>

I OBJECT TO the lack of immediate provision for new schools or doctors – this is just creating an additional local problem for future years. Local services such as schools and doctors are already at capacity.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1219</th>
<th>Respondent: 10725537 / D. Warriner</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
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</table>

I object to the lack of immediate provision of Doctors Surgeries

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/763</th>
<th>Respondent: 10731233 / Linda Aris</th>
<th>Agent:</th>
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<td>Comment ID: PSLPA16/156</td>
<td>Respondent: 10731585 / Robert Thompson</td>
<td>Agent:</td>
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<td>I object to the lack of immediate provision for new schools in the area</td>
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<tr>
<td>I object to the lack of any immediate provision for Doctors Surgeries in the area.</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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<tr>
<th>Comment ID: PSLPA16/3533</th>
<th>Respondent: 10735777 / S. May</th>
<th>Agent:</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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<tr>
<th>Comment ID: PSLPA16/375</th>
<th>Respondent: 10741793 / Dianne Mathie</th>
<th>Agent:</th>
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<tr>
<td>I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.</td>
<td></td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

7/ I object to the lack of infrastructure development in the borough generally to support the proposed housing / commercial development.

8/ I object to the lack of provision for additional school capacity.

9/ I object to the proposed increase in household with no provision for General Health services.

10/ I object to the lack of specific policy to ease an existing rural public transport crisis.

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

I object to the lack of immediate provision for new schools

I object to the lack of any immediate provision for Doctors' surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Send road is already overloaded with traffic, it will become gridlocked increasing noise and pollution levels even further.

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

Attached documents:

---

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

---

7) I object because of there is no provision for education facilities to cover the increased demand.

8) I object because of the lack of any planning to provide the facilities to cover increased demand for health cover at surgeries and for hospitals.

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

Attached documents:
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/1054  Respondent: 10793281 / Paul Woodington  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

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

Attached documents:

Comment ID: PSLPA16/3595  Respondent: 10796417 / Richard Shenton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/3273  Respondent: 10800065 / David Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)
There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

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

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<tr>
<th>Comment ID: PSLPA16/4029</th>
<th>Response: 10800673 / Nigel Rowland</th>
<th>Agent:</th>
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<tr>
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</table>

- I OBJECT to the impact of the Local plan on the local infrastructure. The roads around Send and Ripley are already congested and cannot cope with the current needs. The Local Plan does not incorporate a detailed transport infrastructure strategy that would demonstrate how the road network would support the additional pressure on the roads and other amenities if the proposed development went ahead. The plans to improve the A3 are years off (2025 – 30) and, even if they were implemented, would be preceded by years of gridlock on the local roads. Plans to improve local roads (ref LRN20, specifically Send Road and Send Barns Lane) through an investment of £1.5m will be woefully inadequate to cope with the increased traffic. Additionally, increased traffic through the villages will increase the hazards along the main roads, particularly pedestrians, especially children (using the Send School or catching buses to Guildford schools) and the increasing number of cyclists. This will be exacerbated by HGVs accessing the planned industrial units at Garlick’s Arch.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1768</th>
<th>Response: 10803297 / John Collomosse</th>
<th>Agent:</th>
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</table>

I object to the proposed Infrastructure Schedule

This makes no mention of Garlick’s Arch and therefore infrastructure for this development has not been taken into account. The ill-thought out positioning of the A3 junction at Garlick’s arch instead of say Ockham where 2100 houses are suggested to be built by the Plan further indicates the integration of Garlick’s Arch into the plan is not properly considered and opportunisitic.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/188</th>
<th>Response: 10804993 / Alex Laing</th>
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• I object to the lack of immediate provision for new schools
• I object to the lack of any immediate provision for Doctors’ surgeries, and other local amenities

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

Attached documents:

Comment ID: PSLPA16/322  Respondent: 10805089 / Michael Stuart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

The lack of proposed new infrastructure and facilities just to cope with the needs of those already living in these areas, without increasing the demand by intensifying the housing;

I object to the lack of immediate provision for new schools. GP surgeries etc. locally;

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

Attached documents:

Comment ID: PSLPA16/745  Respondent: 10805121 / Alison Vincent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

The proposals for the A3 will not answer the infrastructure problems or needs of Guildford. We need a tunnel to go under Guildford, removing the impact of through traffic and leaving the existing A3 to provide an additional route across Guildford for local traffic.

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

Attached documents:

Comment ID: PSLPA16/2806  Respondent: 10805537 / Robert Mote  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. Why is there no schedule for Garlick’s Arch (A43)? The Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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:

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlick’s Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

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

Attached documents:

5) I object to the fact that infrastructure requirements have not been considered and our local schools and doctors do not have capacity to deal with so many additional houses. My children will not be able to get a place in their local secondary school if these developments go ahead without new schools being built.

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

Attached documents:
1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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**Comment ID:** PSLPA16/2966  **Respondent:** 10811681 / Linda Knight  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

10. I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlick's Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

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

Attached documents:

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**Comment ID:** PSLPA16/580  **Respondent:** 10816705 / Maggie Cole  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

11. I object to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements for the Plan. There is no schedule for Garlick’s Arch so the Plan takes no account of the infrastructure required for this site.

Furthermore the development at Garlick’s Arch would result in the loss of four successful existing rural businesses, which have been for there many years employing local people and are therefore clearly sustainable.

12. I object due to the congestion that development will cause to the trunk roads, A3/M25

The A3 and M25 would need to be improved before any development can be considered. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no enhancements are possible in the timeframe of this Plan so the developments at Wisley Airfield, Garlick’s Arch and Gosden Hill should not take place.

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: PSLPA16/2940</th>
<th>Respondent: 10816993 / Jane Roberts</th>
<th>Agent:</th>
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<th>Comment ID: PSLPA16/3417</th>
<th>Respondent: 10822913 / Karen Dougherty</th>
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<th>Comment ID: PSLPA16/1076</th>
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</table>
| • I object to the lack of immediate provision for new schools  
  i object to the lack of any immediate provision for Doctors surgeries. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

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<th>Comment ID: PSLPA16/2246</th>
<th>Respondent: 10829409 / Anne Fulton</th>
<th>Agent:</th>
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</tbody>
</table>
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

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

Attached documents:

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Comment ID: PSLPA16/67  Respondent: 10831201 / Norma Plank  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

7) I object to the lack of immediate provision for new schools. The local primary (Ripley) is already full to capacity for the Sept 2016 intake.

8) I object to the lack of any immediate provision for Doctors surgeries. Already I have difficulty securing an appointment at the Villages Medical Centre.

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

Attached documents:

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Comment ID: PSLPA16/1089  Respondent: 10833537 / AC Vause  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/1446  Respondent: 10836033 / Katherine Gervasio  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. I object to the proposed Infrastructure Schedule
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site and is therefore unfit for purpose.

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

Attached documents:

Comment ID: PSLPA16/4024  Respondent: 10836033 / Katherine Gervasio  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site and is therefore unfit for purpose.

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

Attached documents:

Comment ID: PSLPA16/4043  Respondent: 10840769 / Rosemarie Haxton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7) I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

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

Attached documents:

Comment ID: PSLPA16/3906  Respondent: 10845537 / Chloe Moore  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to -

[...]

7) lack of immediate provision needed for new schools
8) lack of any immediate provision for doctors surgery

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

Attached documents:

Comment ID: PSLPA16/2612  Respondent: 10845569 / Stu Edwards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to -

[...]

7) lack of immediate provision needed for new schools

8) lack of any immediate provision for doctors surgerys

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

Attached documents:

Comment ID: pslp173/686  Respondent: 10847521 / Andrew Procter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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 new Guildford Borough Council Transport Strategy 2017.

1.2  I object to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.

1.3  If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4 way A3 interchange at Burpham. It is not feasible to pass the problem down the line to Send which will already be bearing the brunt of traffic generated from a planned 4,000 homes. The A247 link road to Woking already at capacity will become gridlocked.

1.4  I object to SRN4 New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.

1.5  I object to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common). This will place an unbearable problem onto the A247 which is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
11. I object to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements for the Plan. There is no schedule for Garlick’s Arch so the Plan takes no account of the infrastructure required for this site.

Furthermore the development at Garlick’s Arch would result in the loss of four successful existing rural businesses, which have been for there many years employing local people and are therefore clearly sustainable.

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

1. I object to the lack of any immediate provision for doctors surgeries
2. I object to the lack of any immediate provision for car parking as the villages suffers now so this will be unbearable!

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

1. I object to the fact that the infrastructure requirements have not been properly considered and feel that the roads, schools, doctors in this area will not be able to cope.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
WE OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

10. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:

Infrastructure - the Plan does now recognise that the infrastructure will need to be expanded to accommodate the proposed new developments, but is vague on the details and the timing of any improvement. In the case of the proposed Gosden Hill development there is mention of a new exit off the A3, but no commitment or requirement that this be in place before any development can begin. There is no mandatory linking to the A247 which would provide an alternative route into Guildford (via the A246); it is therefore possible that all traffic travelling from the new development to Guildford would be routed along the A3100 (London Road) which simply will not cope. The plan goes on to say 'Interventions will be required which address the potential highway performance issues which could otherwise result from the development.' which acknowledges the traffic issue without saying what solutions the Council has in mind. Clarity on this is paramount.

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

Attached documents:
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

POLICY I1 INFRASTRUCTURE AND DELIVERY

1.1 I object to the new Guildford Borough Council Transport Strategy 2017.

1.2 I object to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.

1.3 If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4 way A3 interchange at Burpham. It is not feasible to pass the problem down the line to Send which will already be bearing the brunt of traffic generated from a planned 4,000 homes. The A247 link road to Woking already at capacity will become gridlocked.

1.4 I object to SRN4 New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.

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

Attached documents:
Infrastructure

I object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

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

Attached documents:

Comment ID: PSLPA16/150  Respondent: 10863937 / Monica Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 any provision for new schools to accommodate the influx of people

I OBJECT TO the lack of provision for doctor’s surgeries and all main services.

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

Attached documents:

Comment ID: PSLPA16/563  Respondent: 10865537 / Edwina Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

**Attached documents:**

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<th>Comment ID: PSLPA16/431</th>
<th>Respondent: 10866305 / Christine Reeves</th>
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11) I Object to the lack of immediate provision for new schools

12) I Object to the lack of any immediate provision for Doctors Surgeries

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

**Attached documents:**

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<tr>
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<td><strong>Lack of proper cycle lanes on local roads</strong></td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td><strong>There are several areas I am concerned about, but to pick a few, allowing Green Belt development to pay for transport schemes will simply generate more traffic from more homes, fuelling congestion.</strong></td>
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<th>Respondent: 10868609 / Robert Lockie</th>
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<td>Respondent: 10869441 / Chris &amp; Louise Dorman</td>
<td>Agent:</td>
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<td>I object to the proposal mentioned at a local meeting to the £1.5 million set aside proposed to be spent on Send Road over the next 10 years. What does GBC think that it actually spend the money on? The road cannot be widened as there are houses along the whole stretch of the road. At the meeting it was clear that this had not been thought out and the only proposal put forward by the GBC councillor was for traffic lights: with the massive increase of traffic, traffic lights would, at best not really help the situation and at worst would probably only enhance the problem.</td>
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<td>Where are the SPECIFIC and realistic plans to deal with the A3? There doesn't seem to be any real concrete plans but only 'aspirational' ones. If you have ever driven on the A3 you will know exactly how often it is traffic logged, frequently dogged with accidents and I have personal experience of sitting in traffic every single journey to collect my child from school. How is creating a new village next to it and building more houses in the neighbouring villages of Horsley, Clandon, Ripley and Send etc going to help ease congestion and reduce carbon emissions in line with national policy? How does this improve the lives of people living in these areas? They are being encircled with concrete.</td>
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</table>
| • I object to the poor provision for infrastructure improvements  
• I object to the lack of provision for more doctor's services  
• I object to no provision for increasing school places  
• I object that there are no plans to increase sewerage or water services. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
I object to the increase in pressure on our local infrastructure. The local schools are full, it is virtually impossible to get a doctors appointment without a wait of at least several days, roads and car parks are already in poor condition and overloaded.

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

Attached documents:

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Comment ID: PSLPA16/4226  Respondent: 10876897 / Norman and Morag Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Lack of infrastructure and traffic implications - I OBJECT

The addition of nearly 14,000 extra homes and 25,000 to 30,000 people has very serious implications for infrastructure and traffic, which the Plan hardly addresses and for which there is little funding (if any) - schools, medical centres, drainage, sewerage and so on, but particularly roads. The impact of Brexit is yet to be fully felt, but will almost certainly limit public funding even further and developers will be reluctant to commit to new developments in an uncertain market.

If the Plan is implemented, it will lead to an increase of around 25,000 to 30,000 vehicles, plus extra traffic generated by developments in other boroughs and by normal traffic growth. The borough’s roads are already overcrowded at particular times and many are in a state of poor repair. Moreover, away from the main arteries, the back roads are often little more than lanes - narrow and with no pavements. For them to safely accommodate all the extra traffic, there would need to be many road changes and adjustments, requiring more road furniture, pedestrian crossings, traffic controls and so on, all having a detrimental impact on the character and nature of our environment, aside from costing a huge amount.

The borough’s main artery, the A3, suffers considerable congestion now, particularly on the southern approach to the town’s turn-off, southwards at the hospital exit, and northwards at the junction with the M25, where pollution levels often exceed permitted levels. The Plan proposes more access to and from the A3 with a four-way junction at Burnt Common and further access at the Wisley junction (see item 6) to accommodate traffic from proposed new developments. These will only increase the number of vehicles using the road, adding excessive traffic levels, increased congestion and pollution.

(There has been talk of building an A3 tunnel under Guildford, but this is a pipedream with no realistic prospect of ever being built, especially because of the huge cost, for which there is no planned funding.)

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

Attached documents:

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Comment ID: PSLPA16/4157  Respondent: 10877665 / Audrey Ivatts Audrey Ivatts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 provision for new schools and health care facilities in the Send and Ripley area.

I object to the lack of infrastructure improvements to help deal with the large increase in road vehicles caused by having so many more people living and working in the area.

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

Attached documents:

Comment ID: PSLPA16/2648  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/1638  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/3307  Respondent: 10890177 / Cheryl Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

Attached documents:

Comment ID: pslp173/147  Respondent: 10890177 / Cheryl Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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: PSLPA16/2149  Respondent: 10906145 / Joe Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/2922  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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:
1. I object to the scale of the development at Wisley, Garlicks Arch and Merrow because there is no provision for appropriate timely investment in infrastructure (Roads, Schools, Hospitals etc). Anyone living locally would confirm that the road infrastructure is inadequate now, never mind having to cope with the extra volumes resulting from the Proposed Plan.

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

Attached documents:
Has sufficient consideration been given to infrastructure? I recall someone from council telling our road AGM a few years ago that ‘planning comes first, and the infrastructure will follow’. What rubbish! Building 400 houses implies 700 cars, and the consequences of that need to be fully accounted for.

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

Attached documents:

**Comment ID:** PSLPA16/2901  **Respondent:** 10922177 / Paul Knight  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

**Comment ID:** PSLPA16/3480  **Respondent:** 10922177 / Paul Knight  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

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There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

**Comment ID:** PSLPA16/3356  **Respondent:** 10925409 / Tina Higgins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

The Local Plan in no way considers the infrastructure required to support that Plan

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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<td>There have been no plans to illustrate the improvement / changes to our roads ways to support the enormous in crease in traffic if the Wisley / burnt common sites go ahead. There is no way to increase roads sizes through the Horsleys.</td>
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Section page number: 103 of 278  
Document page number: 117
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<th>Comment ID: PSLPA16/4494</th>
<th>Respondent: 10959265 / Inger &amp; Ron Ward</th>
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<th>Comment ID: PSLPA16/2530</th>
<th>Respondent: 10960033 / Lucinda Kalupka</th>
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<th>Comment ID: PSLPA16/3412</th>
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There is mention of improvements to the M25 junction but no details are given
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Attached documents:

Comment ID: PSLPA16/2864  Respondent: 10967489 / Jenny Jackson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Attached documents:

Comment ID: PSLPA16/499  Respondent: 10969441 / Mark Woodman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

4. There is a lack of specific details of essential infrastructure.

5. The existing slip road is to become a two way road which will put far more traffic into Burpham that it just cannot take.

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

Attached documents:
Comment ID: PSLPA16/1550  Respondent: 10969601 / Jenny Paviour  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I would like to know also why houses are built first and then the amenities such as doctors surgeries, dentists, schools the basic infrastructure of a working social living area are thought of after, surely it should be included within 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: PSLPA16/3132  Respondent: 10972065 / Sarah Cocke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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1. APPENDIX C

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Comment ID: PSLPA16/1246  Respondent: 10986689 / Richard Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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<td>5. The infrastructure information is not very detailed. Will the area be able to attract enough people to work here? [...]</td>
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<tr>
<td>7. A tunnel is suggested. An excellent idea considering the number of accidents on the A3 as it passes by Guildford and the area. But surely a decision and action are needed on a tunnel before so many houses are built. Changes may be made to the road system which with a tunnel may not be needed. Money will have been spent unnecessarily.</td>
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<td>7) I object most strongly to the lack of immediate provision for new schools</td>
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<td>8) I object most strongly to the lack of any immediate provision for doctors surgeries</td>
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<td>9) I object most strongly to the lack of proper provision of natural resources such as water (four successive very wet winters have given us a short memory of hosepipe bans) and lack of infrastructure such as hospitals, recreation facilities, roads, waste disposal sites, sewage disposal, power generation, parking in shopping areas etc. Creating additional access to the A3 and/or the M25 is not increasing capacity – it will just add to intolerably congested and polluting roads. Minor roads are congested during rush hour and for much of the day, the approaches to J10, in addition to other parts of the M25 are intolerably congested at many times of the day and night, including weekends and even in the small hours when roadworks are being undertaken.</td>
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<td>10) The quality of life and well being of existing residents is getting eroded year on year because there are simply too many people in the country, in the county and in the Borough. We have to say “NO”, enough is enough, we must look after existing residents better.</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: PSLPA16/1987  Respondent: 10990145 / Anne Lee  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</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: PSLPA16/2706  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/2151  Respondent: 10998721 / C E Noble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

6. I object to the fact that no adequate consideration has been given to the provision of infrastructure such as Doctor's Surgeries, Schools and other facilities. There are no proposals for such things to be provided at the same time as the proposed developments. How are these to be serviced? The proposals are wholly inadequate in this respect.

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

Attached documents:

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Comment ID: PSLPA16/4556  Respondent: 11002881 / Sheila Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

We strongly support the need for improvement in the infrastructure of East and West Horsley. However, the GBPSLP is focused on the Infrastructure required to support potential future development. This ignores the fact that the current infrastructure is not functioning in an acceptable manner.
The Infrastructure in the Horsleys is not only failing to meet the current needs of users but some aspects, such as roads, have no obvious possibility for improvement. The boundaries of the B2039, which runs through East Horsley, are such that widening is not possible. The number, vehicle size and speed of the current traffic using this road is already far greater than the original design could have envisaged. The inability of the roads, drainage, schools and medical facilities to adequately support the existing homes within East and West Horsley is evident, and has been acknowledged at Borough and County level. We do not believe that Community Infrastructure Levy is intended or designed to deal with these existing constraints. We therefore object to the development proposals in the Horsleys on the grounds that infrastructure constraints have not been applied, and no data has been produced to demonstrate how the existing issues can be dealt with.

In addition, the impact of the proposed 2,000 houses at Ockham on the site of the former Wisley airfield would have a dramatic affect on the roads, station parking and rail transport overloading for residents of East and West Horsley. It would also create a settlement of questionable sustainability besides removing an environmentally sensitive and strategically placed tract of land from the Green Belt. We therefore object to the identification of this as a strategic development site and request its removal from 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: PSLPA16/1130  Respondent: 11003361 / Howard Milner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 local villages are to be obliterated in an effort to bring money into GBC so that they can fund their vanity project of a tunnelled A3 to Bypass Guildford.

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

Attached documents:

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Comment ID: PSLPA16/706  Respondent: 11003681 / Elizabeth Milner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools

I object to the lack of any immediate provision for Doctors Surgeries

It was mentioned at a recent Send planning meeting that no building would be started until the new road infrastructure was in place which was due to start in 2020. Then it was said that the building would start in 2017. Nobody is using joined up thinking.

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

Attached documents:
I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick's Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:
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<th>Respondent: 11010401 / J M Bates</th>
<th>Agent:</th>
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<th>Comment ID: PSLPA16/4342</th>
<th>Respondent: 11023489 / Trevor Pound</th>
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<td>I OBJECT TO the lack of immediate provision of local schools.</td>
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<td>There is no question that the South East is overcrowded. Whilst I appreciate that this is somewhat inevitable, and refrain from pressing the blame on any one group, it is a fact. It is also a fact that, however honourable this strategy to increase housing at such a rapid rate, local schools will simply not be able to cope.</td>
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<td>In following this strategy, you risk condemning a whole generation of local children to inadequate education. I understand that the Local Council enjoys a Conservative majority in this Borough. As a member of the Conservative Party, I feel absolutely ashamed that you would turn your back on a central principle of the party: equal opportunity. The lack of schooling in the area will cripple the chances of the younger generation of locals.</td>
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<td>Comment ID: PSLPA16/669</td>
<td>Respondent: 11023585 / Jean Walker</td>
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<td>9.) The proposed Infrastructure Schedule (Appendix C)</td>
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<td>Comment ID: PSLPA16/2251</td>
<td>Respondent: 11039681 / Bruce Jeffreson</td>
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<td>I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.</td>
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<td>I strongly object to the new Local Plan for the following reasons:</td>
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<td>1/ Adequate infrastructure is not in place to accommodate these developments and no provision has been allowed for such – particularly roads and waste. The local roads cannot handle the current traffic numbers – without significant investment in alternative road systems the local area will become completely clogged with traffic.</td>
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<tr>
<td>4/ I support a tunnel from Send to Compton that takes the through traffic on the A3 away from our local roads. I also support a four way junction at Send or Potters Lane with a direct route through to Merrow. I also support a four way junction at the A3/A320 in Guildford so that A3 traffic have direct and improved route through to Woking</td>
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The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/3499  
Respondent: 11044129 / Christopher Barrass  
Agent:

Document:  
Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/1227  
Respondent: 11047329 / Hazel Corstin  
Agent:

Document:  
Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: pslp173/698  
Respondent: 11047329 / Hazel Corstin  
Agent:

Document:  
Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
11. In policies SRN9 and SRN10 I note the change in responsibility for delivering new A3 slip roads at Burntcommon from Surrey County Council to either Highways England or developer. I have concerns that if delivered by Highways England alone there would be no local level control over if/when/how the scheme was delivered. This is an existing concern for other schemes including SRN2 and SRN3 (Stoke interchange and M25 J10/A3 interchange), where Highways England have sole responsibility.

12. 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 our 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.

13. Furthermore, given the delivery dates of some policies (scheme E31 talks about widening the carriageways from 2023 at the earliest), and given the current economic conditions, can The community expect the schemes to be delivered on time/at all, and will they already be out of date when realised?

14. I note that the local road strategy allows for 30 electric car charging points, but I would suggest that this is likely to be an underestimate in the coming 20 years, given the rapid increase in acceptance and adoption of electric/hybrid cars in recent years.

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?

Attended documents:

1. I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope and there are already problems with GP access and school places.

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

Attended documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp173/110  Respondent: 11051521 / J and M Baylis  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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

Many schemes now ‘Developer funded’ instead of ‘Developer contribution’.

SRN7 and SRN8 (A3 slips) now ‘committed’.

LRN23 new Onslow Street/Woodbridge Road junction works.

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

Attached documents:

Comment ID: PSLPA16/3102  Respondent: 11053825 / Claire Owen  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Attached documents:

Comment ID: pslp173/339  Respondent: 11053825 / Claire Owen  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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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 the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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: PSLPA16/2972  Respondent: 11074465 / Louise Vaughan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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: PSLPA16/1580  Respondent: 11074561 / Tim Anderson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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: PSLPA16/433  Respondent: 11084865 / Nick Hinchliff  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. There has been **no implementation of the necessary infrastructure** to support the proposed increase in housing, particularly as regards West and East Horsley, in terms of roads, school places, drainage, telecommunications, power supply and local amenities. A proposal to put forward this Local Plan to enable developers to move in without having secured these infrastructure increases would be reckless and incompetent planning.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3750</th>
<th>Respondent: 11098369 / Neil &amp; Nicki Covington</th>
<th>Agent:</th>
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</thead>
<tbody>
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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:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1640</th>
<th>Respondent: 11114721 / Elizabeth Wilcockson</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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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1119</th>
<th>Respondent: 11115201 / Philip Colinese</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</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>

Infrastructure: The large number of proposed homes would have a significant impact on the need for road capacity. Burpham already is often swamped by traffic because of blockages on the A3. New roads would be needed on the proposed development sites but the Plan contains no provision for improvements to the A3 or local roads. Development
on the Gosden Hill site, for example, would require major drainage provision for which no proposals are given. It would be a major flaw to permit development of the proposed sites without first settling on improvements to the A3, preferably by tunnelling under Guildford.

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

Attached documents:

Comment ID: PSLPA16/1415  Respondent: 11115201 / Philip Colinese  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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: PSLPA16/3749  Respondent: 11150913 / Sarah Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/373  Respondent: 11151617 / Nigel Tallick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:

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We act for Crimson Project Management. This representation relates to the INFRASTRUCTURE AND DELIVERY - Policy 11 and INFRASTRUCTURE SCHEDULE - Appendix C.

The Consultation Draft Guildford Borough Local Plan July 2014 identified a need for a new five form entry secondary school to the north of Guildford. A site for the school was proposed to be allocated at Salt Box Road, Guildford.

The Regulation 19 Submission Draft has deleted this proposed allocation. Instead, Item SED3 of Appendix C identifies a seven form entry secondary school allocation at a strategic site at Normandy/Flexford. The proposed new secondary school is to be located close to Wanborough Railway Station. It is stated that only one form of entry would be required to serve the strategic development itself, with the remaining capacity serving the wider area, including the Blackwell Farm strategic site.

Crimson Project Management has recently submitted a planning application for a mixed use development which would include a new five form entry secondary school as part of a sustainable urban extension to Fairlands which is in a significantly more sustainable location to serve the needs of north Guildford, the wider area and any further development that may take place at Blackwell Farm and/or Normandy/Flexford.
Attached to this letter is a comparative analysis of the sustainability merits of the respective proposed locations for both the new school and new housing of the Rokers/Fairlands development and the Normandy/Flexford development. The conclusions of the analysis demonstrate that the Rokers/Fairlands site is a significantly more sustainable location for the new secondary school than Normandy/Flexford.

The results of the analysis show that a substantial portion of the catchment for the new school would be from northern Guildford. In those circumstances, the proximity of Wanborough Station to the Normandy/Flexford site would be of little or no benefit in that pupils would need to travel into central Guildford to get the train back out. Equally, for those pupils travelling on the KITE service, it would make no sense for them to have to travel past the Rokers site on the A323 for several miles to get to the Normandy/Flexford school site.

The Infrastructure Schedule contained at Appendix C should be amended, therefore, to include provision of a new five form entry secondary school on the Rokers site as part of a new mixed use development to include housing, community uses and sporting facilities.

Transport Planning & Infrastructure Ltd has been instructed by Crimson Project Management Ltd to prepare Transport Representations in respect of the Guildford Borough Council Proposed Submission Local Plan.

These transport representation focus on the exclusion of the Rokers site at Fairlands Farm, Holly Lane from the Draft Local Plan and seek to justify its inclusion. The site is currently subject to an outline planning application (reference 16/P/01397) for the construction of up to 370 residential dwellings and a new school/educational facility.

In addition, these representations seek to provide a comparison of the Rokers site against the Normandy/Flexford allocated site A46, demonstrating how the Rokers site benefits from being located in a more sustainable location than Normandy/Flexford.

**Location**

This site is located to the south of Normandy, linking the villages of Flexford and It is located within a parcel of land, broadly bound by the A323 Guildford Road to the north, the Guildford - Ash railway line to the south, Westwood Lane to the west and Glaziers Lane to the east. It should be noted that the allocated site does not comprise all of this area, though these broad boundaries constrain the site location. The portion of land is reduced due to residential properties being located along Glaziers Lane, which are outside of the site ownership boundary.

**Local Highway Network**

The following paragraphs provide a description of the key local roads in the vicinity of the site.

**A323 Guildford Road**

- The A323 is part of the distributor road network, linking Guildford to the east with Ash and Aldershot to the west. The A323 is a single carriageway road along its length, with a 30 miles per hour speed limit along the length of the A323 through Normandy. The speed varies between 30 mph and 40 mph to the west of the site, and includes a section of 50mph carriageway to the east of Normandy.

- The A323 is subject to high traffic flows, especially in the peak hours. The route represents a key route into Guildford, avoiding the A3 or A31.

Pedestrian footways are located along the southern side of the A323 carriageway through Normandy in the vicinity of the site.

**Westwood Lane**

- Westwood Lane is a 'C' class route (C16) providing a link on a predominantly north south axis between Normandy and the A31 to the south, in
• Westwood Lane is subject to a 30 mile per hour speed limit through Flexford, with sections subject to a 40 mph speed limit to the north and south of

• The route is subject to a width and height restriction by way of a bridge under the railway line, which restricts vehicles below 14 feet and 3 inches. This bridge is also restricted to a single lane of traffic, with priority given to southbound traffic movements.

• Pedestrian footways are provided on both sides of the carriageway through Flexford, with only one footway provided between Flexford and Normandy, along the eastern side of the carriageway.

**Glaziers Lane**

• Glaziers Lane is subject to a 30 mile per hour speed limit, and routes from the A323 in Normandy to Westwood Lane in Flexford, via Wanborough railway. This road is unclassified (060), and is lightly trafficked.

Along the northern section of Glaziers Lane, between the A323 and Normandy Village Hall, footways are provided along both sides of the carriageway. To the south, footways are provided on one side of the carriageway, with the footpath altering each side of the carriageway on numerous occasions.

**Proximity to Bus Services**

• The A323 Guildford Road is a bus corridor for the frequent KITE service, linking Guildford and Aldershot at 15 minute intervals in each.

• This service would be accessible to the northern portion of the Flexford/Normandy site, with bus stops located in the vicinity of the Guildford Road/Westwood Lane/School Lane crossroads junction and in the vicinity of the Guildford Road/Glaziers Lane/Hunts Hill Road crossroad. Figure 1 provides an indication of the extent of the site that can access these bus stops based on a 400 metre walk distance using the existing road and footpath network. This Figure indicates that only a minimal portion of the site is accessible by bus.

• Additional bus services route along Westwood Lane and Glaziers Lane, with the PT5 bus providing a link to St. Peters School in the morning and an additional school service, the 694, operates towards Broadwater School.

• The 520 bus service is a variation of the KITE bus service, which includes a loop along Westwood Lane and Glaziers. The timetable for this service is included at Appendix A; there are just two services operating daily towards Guildford and Woking (Woking service operates on Wednesday only), and four services operating (reduces to three on Wednesdays) towards Aldershot.

**Proximity to Rail Services**

• The site is located immediately north of the Guildford - Ash railway line, with Wanborough railway station located in the south eastern corner of the A. A summary of services available from this station is provided in Table 1 below.

<table>
<thead>
<tr>
<th>Service</th>
<th>Destinations Served</th>
<th>I AM Peak</th>
<th>I PM Peak</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford</td>
<td>Guildford</td>
<td>Half Hourly</td>
<td>Half Hourly</td>
</tr>
</tbody>
</table>

Figure 1
Table 1 indicates that Wanborough station is served by three rail services routing westbound in the weekday morning peak hour and two services routing in the weekday evening peak hour, three services route eastbound and two services route westbound.

- Summary

- To summarise the accessibility of the site, Figure 2 provides a public transport travel time plan from the site, highlighting areas that are accessible within 15, 30 and 60 minutes' public transport travel time. This Figure is produced based on public transport options available between 07:00 and 09:00 on a weekday.
- This Figure indicates that Guildford town centre, in the vicinity of the bus and train stations, is accessible within a 30 minutes' travel time from the site. However, the majority of locations surrounding Guildford are located within 60 minutes' travel.

**ROKERS SITE**

- The Rokers site has been excluded from the Proposed Submission Local Plan, but is subject to a live planning application (reference 16/P/01397). This application seeks outline planning permission for:
  - Up to 370 residential dwellings;
  - A new school/education facility (proposed at this stage to be a secondary school);
  - A new community hub with children's nursery, community offices, children's play centre and commercial units;
  - Highway improvements to the A323;
  - Landscaped open space; and
  - A provision of SANGS

With this application being a live planning application, it would be considered that if this application is approved, a school at the Normandy/Flexford site would not be required.

The Rokers site was put forward for inclusion within the Local Plan, but has not been suggested as a draft allocation by the Council. In terms of location and accessibility, it is considered that the Rokers site represents a more sustainable location for a school and residential development than others suggested in the plan.

**Location**

The Rokers site is located on the eastern side of the A323 Aldershot Road, to the east of Fairlands Village. The site is bound to the north-west by Holly Lane, a link between the A323 Aldershot Road and the A322 Worplesdon Road, and to the west by the A323 Aldershot Road.

- Merrist Wood College is located to the north-west of the site, across Holly. The Rokers site therefore provides the potential for an educational hub to be created in the area, with a bus interchange facility provided within the application site to enable bus services to serve both educational sites.
Local Highway Network

- A description of the key vehicle routes in the vicinity of the application site is provided in the following paragraphs. Where relevant, reference is made to a number of automatic traffic counters (ATC) that have been placed on the carriageway in order to record traffic volumes. Each ATC recorded data for a 7-day period between 1st and 7th March 2016.

A323 Aldershot Road

- The A323 Aldershot Road routes on a north-west to south-east axis along the site. At the roundabout junction with Holly Lane, the A323 routes west towards Aldershot. The A323 is an important transport corridor as a county distributor road providing access between Guildford and Aldershot and to the A331 in the vicinity of Ash.

Along the site frontage, the A323 Aldershot Road is subject to a 40 miles per hour speed limit with a pedestrian footway provided along the eastern side of the road. Through the residential areas within the Guildford boundary, Aldershot Road is subject to a 30 mph speed limit and has footways along both sides of the carriageway.

An ATC placed along the A323 between the Holly Lane roundabout junction and Fairlands access junction recorded a two-way average annual daily traffic flow (AADT) of 13,109 vehicles. This was split 52% westbound/48% eastbound.

Holly Lane

- Holly Lane routes on a north-east to south-west axis to the north-west of the Holly Lane roundabout, and is subject to a 40 miles per hour speed limit and has a shared foot and cycleway along the southern side of the carriageway. This shared foot/cycleway extends along the existing Rakers access road onto Aldershot Road.

An ATC placed along Holly Lane between the existing Rakers access and the Worplesdon Road roundabout junction recorded AADT traffic flows of 10,325 vehicles. This traffic is evenly distributed, 50%/50% between north east and south west bound vehicle movements.

Accessibility to Existing Infrastructure

Proximity to Bus Services

The KITE service routes along the A323 in the vicinity of the site, with services provided between Guildford and Aldershot at 15 minute intervals.

- The closest bus stops to the site are located in the vicinity of the Fairlands Avenue/A323 Aldershot Road priority junction, with the bus stop for northbound services located to the north of the junction and the southbound bus stop located to the south of this.

- Figure 3 provides a 400 metre walking isochrone to indicate areas that are located within 400 metres walk of these bus stops. Figure 3 indicates that the majority of the site is accessible within 400 metres walk, based on the existing infrastructure and walking routes, with only the corners of the site located outside of this walk distance.

In comparison, only a small portion of the Normandy/Flexford site is located within walking distance of a bus stop servicing the frequent KITE service, indicating that the Rakers site is more accessible by bus services based on existing infrastructure. This is beneficial as it negates the need for any re-routing of existing bus services or any new bus services to be created, instead increasing the patronage on the profitable KITE service.

In addition, the 17 service provides additional services between Fairlands and Guildford, though less frequent than the

Proximity to Rail Services
• Whilst the nearest railway station to the site is Worplesdon station, the easiest station to access from the site is Guildford railway The KITE service can be used to access Guildford town centre, with no public transport links available to Worplesdon station.

• Worplesdon station is located on the mainline London Waterloo - Portsmouth railway line and is served every 20 minutes towards London Waterloo and half hourly towards Haslemere and Portsmouth in the weekday morning peak hour. During the evening peak hour, services operate every 20 minutes towards Haslemere and Portsmouth and half hourly to London Waterloo

Guildford railway station is located on the North Downs Line, in addition to the London Waterloo mainline, providing additional services between Reading and Gatwick Airport. Table 2 below summarises the rail services accessible from Guildford station.

<see attachments for table 2>

• Table 2 indicates that Guildford station is well served by rail services, especially in comparison to Wanborough station served by the Flexford/Normandy

Summary

• To summarise the accessibility of the Rokers site, Figure 4 provides public transport travel time isochrones detailing areas that are accessible within 15, 30 and 60 minutes' travel time from the site. It should be noted that Guildford town centre is accessible within a 30-minute travel time from the site, with Woking also accessible within this timeframe.

RESIDENTIAL AND SCHOOL COMPARISON

Whilst the above sections detail information on the location and accessibility of the two potential sites, this section will provide more of a direct comparison in respect of access by public transport for the residential and school aspects of each

Residential Accessibility

• For the residential development, accessibility to the local towns is vital, as these are the areas where the majority of residents will work and head for shopping and leisure trips.

• Figures 2 and 4 provide travel time isochrones from each site and enable the allocated Flexford/Normandy site and the proposed Rokers site to be directly compared.

• Figure 2 indicates that the Flexford/Normandy site enables Ash, Wanborough station and Fairlands to be accessed within 15 minutes' travel time from the site. In comparison, Figure 4 indicates that Guildford bus station is accessible within 15 minutes' travel from the Rokers site, along with Ash railway station, and sections along the A323 and A322 Worplesdon Road.

• In terms of accessibility to local towns, Figure 4 indicates that the Rokers site can access much of Guildford town centre within 30 minutes' travel time, along with Ash and a section of Aldershot. In addition, areas of Mayford are also accessible within a 30 minutes' travel time from the site. Woking is accessible within 60 minutes' travel time alongside Godalming, Clandon, Farnham, Farnborough and areas to the south of Guildford.

In contrast, Figure 2 indicates that the Flexford/Normandy site can access Ash within 15 minutes, and sections of Aldershot and Guildford within 30 minutes' travel time. Within 60 minutes' travel, Woking, Farnborough, Godalming and areas to the south and east of Guildford are accessible.

• To compare the two locations, the areas accessible within a 60-minute travel time are broadly similar, as expected from the relatively short distance between the sites along the The key difference between the sites is the proximity to Guildford town centre, with Rakers accessible to the majority of the town centre within 30
minutes and the bus station within 15 minutes. This indicates that the Rakers site is more sustainably located to residents commuting to work by sustainable modes, with more key locations located within a shorter commuting distance.

School Accessibility

- To assess the accessibility of the school, assumptions need to be made regarding the likely school catchment. This information is not publicly accessible, and therefore assumptions have been based on existing school catchment areas and the stated need for a school to the north and west of Guildford.

- As the Rakers site has already been submitted as a planning application, this comparative assessment will make use of the assumptions undertaken within the Transport Assessment for this development. This utilised a gravity model approach to assess the likely school catchment.

- It is assumed that demand for school places would be mostly driven from northern Guildford and surrounding rural area locations towards Ash and Aldershot and north to Mayford and Given the difference in residential population between Ash and Guildford, the majority of students are expected to come from the north Guildford area.

- By assessing the locations of the nearest secondary schools to the site and their indicative catchment based on school acceptance criteria for distance from the school, it can be seen that Ash is served by Ash Manor. The north west area of Guildford is served only by small school catchments in Bellfields (Christ's College) and Park Barn (King's College). On this basis, a 65% to 10% split will be assessed between Guildford and Ash for the purposes of this gravity model, with the remaining trips from the outlying areas between Ash and Guildford.

- Census data relating to the number of children per ward has been investigated to provide a more detailed gravity model, with Figure 6.6 of the Transport Assessment included at Appendix B providing the gravity model plan used within this. This indicates that the north Guildford area, and in particular the wards of Westborough, Stoughton and Stoke would represent the key catchment area for the school.

- Figures 2 and 4 provide an indication of the likely travel times from each site in the weekday morning peak hour and these provide an indication of the accessibility of the school catchment area to each.

Figure 2 indicates that Westborough ward and a portion of the Stoughton ward are accessible within 30 minutes' travel time from the Flexford/Normandy site, whilst the whole catchment is accessible within a 60 minutes' travel time. Figure 4 indicates that the Rakers site can access portions of the Westborough and Stoughton wards in 15 minutes, with the entirety of these wards and a portion of the Stoke ward accessible within 30 minutes' travel time to the Rakers site. Again, as with the Flexford/Normandy site, the full catchment is located within a 60 minutes' travel time of the site.

- In terms of accessibility towards Ash and the outlying areas, there is little difference between the two sites, with a large part of the outlying areas accessible within 15 minutes' travel Ash railway station is accessible within 15 minutes' travel time with the remainder of Ash accessible within 30 minutes of the Rokers site. In comparison, the Flexford/Normandy site provides access to a larger area of Ash within a 30 minutes' travel time, with areas along the route to Aldershot more accessible.

- It can be seen that the Rakers site represents a more sustainable location for the school based on its proximity to the residential areas.

Summary

- In summary, it is considered that the Rokers site is clearly better in terms of accessibility and location to the Flexford/Normandy allocated. This is due to key areas including the potential school catchment area and workplace areas within Guildford being more accessible from the site, with larger areas accessible within a 15 and 30-minute travel time from the site.

SUMMARY AND CONCLUSION
Transport Planning & Infrastructure Ltd has been instructed by Crimson Project Management Ltd to prepare these Transport Representations against the Guildford Borough Council Proposed Submission Local Plan.

These representations provide a comparison between the Flexford/Normandy allocated site and the Rokers. The Flexford/Normandy site is included as allocation A46, with the Rokers site excluded from the Proposed Submission Local Plan.

The Rokers site is subject to a live planning application for an educational facility and residential development on land to the east of Fairlands.

In summary, these representations have identified that the Rokers site is ideally located to key infrastructure, with the majority of the site located within a 400 metre walk distance to the frequent KITE bus. In contrast, the Flexford/Normandy site is poorly located to existing public transport infrastructure, despite the location of Wanborough station in the south eastern corner of the site.

In terms of accessibility, the Rokers site is more conveniently located in terms of travel times to local towns and the potential school catchment area, with more key areas accessible within 15 and 30 minutes' travel time compared to the Flexford/Normandy site.

On this basis, it is considered that the Rokers site provides a significantly more sustainable location for an educational facility and residential development than the draft allocations.

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

Attached documents: POLICY I1 & APPX C_20160715133341.pdf (1.6 MB)

Comment ID: PSLPA16/4022  Respondent: 12050145 / richard gunston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

There is no infrastructure in place to support such a building project.

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

Attached documents:

Comment ID: PSLPA16/4322  Respondent: 13565569 / Persimmon Homes (Matt Richardson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

The following comments should be read alongside the Odyssey Markides Technical Note dated July 2016, which accompanies these representations. We have drawn some of the comments within the Technical Note out, but expansions of these points are made within the note.

Two land allocation policies of note in the draft LP are Policy A29 and Policy A30. Policy A29 is a land allocation for up to 1,200 dwellings on land adjacent to that in control of PHTV, between Foreman Road and Harper's Road, as well as other small areas to the west. Policy A30 allocates land which is, in part, under the control of PHTV for provision of a new railway over bridge for vehicles and pedestrians. This new bridge will facilitate the closure of the existing level crossing on the A323 Guildford Road allowing unrestricted movement along the A323 and safer crossing for pedestrians; refer to Drawing NGBC-ASHSTATION.1/04 (Mayer Brown, November 2015).
Having reviewed the proposed railway over bridge it is apparent that it has been designed with some relaxation in Design Manual for Roads and Bridges (DMRB) standards applied, in order to allow the bridge to closely align to the existing route of the A323. A 30mph design speed has been used, with 90m forward visibility provided.

Based on this data it is considered that although implementing a new bridge over the railway line would be effective in reducing delay to the local highway network, it is not necessary in highway capacity terms as the operation of the level crossing would still be within capacity even after the LP developments are implemented.

The new bridge is set out in the Guildford Borough Transport Strategy 2016 as Local Road Network (LRN) Scheme LRN21 'New road bridge and footbridge scheme to enable level crossing closure on A323 Guildford Road adjacent to Ash railway station'. Its status is 'Anticipated' and its estimated cost is £15m, with delivery between 2017 and 2026.

Those schemes categorised as anticipated are 'subject to a positive business case, funding can be secured, and planning and statutory approvals are likely to be achieved'.

The GBC Infrastructure Schedule, contained in Appendix C of the draft LP, states that the likely cost is £15m and the likely funding sources will be developer contributions, Local Growth Fund and from Network Rail. This document sets the delivery timescale as between 2018 and 2022.

It is reasonable for some material funding to come from developers of 'Land to the South and East of Ash and Tongham' for 1,200 residential dwellings, as set out in Policy A29.

It is however understood from the Enterprise M3 Local Enterprise Partnership (LEP) that there has been no submission made to the LEP for funding. The latest Expression of Interest (Eal) for the Enterprise M3 Local Growth Fund closed on 31 March 2016. This Eal allows for funding requests for schemes up to the year 2020/21. As the new railway bridge is stated as being delivered before 2026 it is therefore concluded that either (1) the bridge would be funded by developer contributions and Network Rail only or (2) that LEP funding will be requested in future and the delivery of the bridge would occur towards the end of the suggested delivery timescales (i.e. 2026).

It is not clear how much funding Network Rail would be providing for this new bridge. Network Rail would likely have to also fund a new pedestrian cycle footbridge with lifts in order to maintain, or improve, the current level of accessibility for local residents. Relying on pedestrians and cyclists using the new bridge would be contrary to this given the material greater distance to cross the railway line and the steepness of the proposed crossing. The cost of the footbridge with lifts could be c.£1.5M.

It is therefore unclear why GBC would classify this new bridge as 'anticipated' rather than 'aspirational'. Aspirational schemes are classified as 'a strong business case will need to be demonstrated in order to secure funding as the estimated cost presently exceeds typical funding envelopes and or there are significant planning and statutory approvals to be achieved'.

No details are publicly available with respect to the vertical alignment of the new bridge; however, it appears that the northbound forward visibility over the bridge would be materially compromised.

This is due to the gradient of the road between Foreman Road and the crest of the bridge, which would likely materially reduce the forward visibility in the vertical plane.

The forward visibility would also be impinged by the actual bridge structure. The bridge would need material safety structures and barriers along the edge of the parapets and embankments for both pedestrian and driver safety. As these would be a solid structure of over 600mm in height it would therefore compromise forward visibility, especially in the northbound direction.

Although it is understood that the location of the bridge was chosen to align as closely to the existing alignment of the A323 as possible, this alignment is not considered feasible.

It is also clear that no discussions have taken place between the parties over the delivery of the wider scheme and there is no common agreement over delivery, timings and funding etc and therefore piecemeal development will continue to come forward in the short term, further impacting upon the aspirational road scheme to come forward.
For those reasons listed above we therefore are of the view that the plan is unsound, because it is not justified, effective or indeed consistent with national policy.

**Question 2: Legal Compliance**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

why you consider it is or is not legally compliant and

what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

For those reasons set out above we do not believe that the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant. We have set out suggested changes under question 3 below.

**Question 3: Soundness**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

why you consider it is or is not sound and

what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

For those reasons set out previously we do not believe that the plan as proposed is sound. Whilst the concept within A30 of a road bridge, is a sound one, it is obvious that the evidence base supporting both its identification and indeed location are fundamentally flawed.

A more appropriate approach would see the complete delivery of land east of Foreman Road for residential development, with land being safeguarded for the delivery of a pedestrian crossing. The road bridge could then be delivered more appropriately within the major development area. This would allow units to be delivered early within the plan period, which as has been shown previously is much needed and more importantly, will allow the delivery of a new bridge, which has been designed properly, is deliverable, appropriate and capable of serving not only existing residents, but also future ones.

It is not considered that the new rail bridge is required at this time, as the vehicle queues at the existing level crossing clear between the time that the barriers are down and as already determined by sec the crossing would still operate within capacity even in 2031 with the addition of the LP sites.

It is however considered reasonable that there is a long-term desire to close the level crossing and provide a bridge over the railway line. It is indeed Network Rail policy to close level crossings wherever possible, in order to improve pedestrian safety and reduce rail related accidents.

If it is accepted that the level crossing should be closed and an overbridge provided in the long-term, it is considered that there is a more suitable location for the new bridge. It is considered that the bridge should be located further southeast. This would then sit across the land between the A323 and the Policy A29 land boundary and within the latter itself.

This has a number of benefits, most notably there would be more land for the road alignment to be designed to allow for sufficient forward visibility, both in the vertical and horizontal planes.

There is also the potential for a new comprehensive link road to be established between the A323 Guildford Road, through the 'Land to South and East of Ash and Tongham' site, to South Lane. This link road would then continue through the 'Land South of Ash Lodge Drive' site, as per their planning permission, to Manor Road.

The northern end of the link road could realign Guildford Road into the 'Land to South and East of Ash and Tongham' site, which could then provide the new bridge within land under this site's control. This could also have the benefit of
enabling the parcel of land to the north of the railway line (and west of the new road) to realise a car park or drop-off area for Ash Railway Station.

The new bridge over the railway line could also be designed to have less environmental impact, than the current proposed alignment, as it could be fully designed into the proposed 1,200 residential unit development. The spine road, south of the railway line, would connect south to South Lane and also connect to Foreman Road thus giving alternative routeing options for both development and through traffic.

The principle of a new railway bridge to come forward in the long-term alongside the closing of the level crossing is accepted; however, it has been demonstrated that this is not required in the short-term.

Furthermore, it is considered that in order to realise a suitable design, and thus implementation, a revised alignment would be needed. A more suitable and achievable location for the bridge, and the alignment of the A323 either side of the bridge, would be for it to align through the Policy A29 site. This could enable the bridge to be designed in accordance with DMRB standards with suitable forward visibility achieved.

**Question 4: Duty to cooperate**

*Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:*

*why you consider it has or has not complied with the Duty to cooperate and what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.*

Please see our comments and responses under question 1. Whilst the council should be applauded for making difficult decisions with regards to the increase in the housing numbers to be planned for and indeed decisions associated with Green Belt releases it is clear that the Duty to Cooperate has not been met with regards to seeking to meet the needs from London for example.

**Question 5: Examination**

*If you are proposing a change to the Proposed Submission Local Plan: strategy and sites, do you wish to express an interest in participating at the Examination?*

*If you choose yes, please explain why you wish to participate in the Examination.*

We would like the opportunity to attend the Examination in Public as we believe that the comments, recommendations and observations we have made need to be discussed in a public arena and so that we can outline the reasons for the emerging plan failing the soundness tests as drafted.

**Question 6: The content of the plan**

*Question 6 of the paper version of this questionnaire asks you to make comments about particular paragraphs, policies or site a/locations in the Proposed Submission Local Plan: strategy and sites.*

Please see our earlier comments as they specifically relate to S2, A29 and A30.

*I trust that everything is in order and that the above comments are helpful.*

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

**Attached documents:**

- **20160718114724534.pdf** (928 KB)
- **20160718152652831.pdf** (1.4 MB)
- **20160718152735975.pdf** (1.1 MB)
- **20160718152825671.pdf** (1.5 MB)
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<tr>
<th>Comment ID: PSLPA16/54</th>
<th>Respondent: 13707041 / Kirsty Lockie</th>
<th>Agent:</th>
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The other issue that I wanted to comment on was the issues with traffic in Guildford town. This is a key and major aspect of success for this local plan - there needs to be a realistic and effective plan to manage traffic around the town and from the proposals I’ve seen so far, they do not go nearly far enough and in some cases look like they might make the situation even worse.

I hope these comments are helpful.

**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: PSLPA16/2628</th>
<th>Respondent: 13713825 / Barry Williams</th>
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However, I feel that more needs to be done to mitigate the possible effect of increased traffic levels on the A 281 should the Dunsfold Aerodrome housing development go ahead in our neighbouring borough and offer some suggestions - in part based on an old GBC document

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

Attached documents:

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<th>Comment ID: pslp173/158</th>
<th>Respondent: 15062817 / Keith Liddell</th>
<th>Agent:</th>
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We agree with the proposed changes as they relate to the removal of site allocations A46 and A47 from the 2017 Local Plan.

We would, however, like to see LRN17 road improvement to be brought forward in time and council funded, rather than the proposed developer funded, as that intersection is already a major bottleneck and is a very dangerous intersection.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

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

Attached documents:

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[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

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

Attached documents:
8) I object to the lack of immediate provisions of new Doctors Surgeries

9) I object to the lack of immediate provisions of new schools

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

Attached documents:

Finally, you cannot expect an area and infrastructure such as the A3 and Junction 10 of the M25 to keep taking traffic from Surrey and the South:

The A3 backs up Northbound at the M25 for miles each morning
The A3 also backs up Northbound approaching Guildford (cathedral hill) in the morning.
The A3 is choked with 2-3 mile gridlocks every evening with return traffic around Guildford Bypass
The A31 is gridlocked trying to join the A3 from close to Farnham (4-5 miles) every morning
The A247 is gridlocked through Send approaching the Burntcommon roundabout every morning
Ripley High Street is gridlocked at both rush hours at the Pyrford Lane junction.

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

Attached documents:

3) I object to the fact that there is no thought to the infrastructure of the sites by way of doctor’s surgeries, schools etc.

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

Attached documents:
I OBJECT to the lack of provision for new schools and doctors which are already under strain with the population increase.

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

Attached documents:

Comment ID: PSLPA16/73  Respondent: 15112257 / Richard Winzor  Agent:

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

3) Other local infrastructures such as Power, Water and Sewage and Healthcare will be severely strained. There appears to be no provision for improvements to the first two, which would in any case cause more disruption to the area, with local roads being excavated to accommodate larger sewers and more power cables. The local area seems to be continually dug up as it is! The local Healthcare, such as the Villages Health Centre in Send, is also currently strained and could not cope with an influx of the residents for the proposed 6500 homes.

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

Attached documents:

Comment ID: PSLPA16/85  Respondent: 15114657 / Jane Hill  Agent:

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

I object to the 2016 draft local plan for the following reasons:

[...]

7) I object to the lack of immediate provision for new schools.

8) I object to the lack of immediate provision for doctors surgeries.

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

Attached documents:

Comment ID: PSLPA16/88  Respondent: 15114721 / Leslie Macnair  Agent:

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

7 I object to the lack of immediate provision for new schools

8 I object to the lack of any immediate provision for doctors' surgeries
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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7 I object to the lack of immediate provision for new schools

8 I object to the lack of any immediate provision for doctors' surgeries

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

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<th>Respondent: 15114753 / Lauren Pott</th>
<th>Agent:</th>
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I object most strongly to the lack of immediate provision for new schools

I object most strongly to the lack of any immediate provision for doctors surgeries

I object most strongly to the lack of proper provision of natural resources such as water (four successive very wet winters have given us a short memory of hosepipe bans) and lack of infrastructure such as hospitals, recreation facilities, roads, waste disposal sites, sewage disposal, power generation, parking in shopping areas etc. Creating additional access to the A3 and/or the M25 is not increasing capacity – it will just add to intolerably congested and polluting roads. Minor roads are congested during rush hour and for much of the day, the approaches to J10, in addition to other parts of the M25 are intolerably congested at many times of the day and night, including weekends and even in the small hours when roadworks are being undertaken.

10) The quality of life and well being of existing residents is getting eroded year on year because there are simply too many people in the country, in the county and in the Borough. We have to say “NO”, enough is enough, we must look after existing residents better.

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

Attached documents:

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<th>Comment ID: PSLPA16/134</th>
<th>Respondent: 15136481 / Roy Padgett</th>
<th>Agent:</th>
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j. I object to the lack of immediate provision for new schools.

k. I object to the lack of immediate provision for additional doctors surgeries.

Please ensure that these objections are taken fully into account.

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

Attached documents:
I am thinking of selling my house to move out of this chaos but now the price of my house will suffer because of this. I am extremely disappointed resident and would like objections to be heard and responded to.

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

Attached documents:

Comment ID: PSLPA16/148  Respondent: 15138305 / A Cripps  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools

I object to the lack of any immediate provision for doctors surgeries.

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

Attached documents:

Comment ID: PSLPA16/149  Respondent: 15138849 / Anne Walters  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 provision for new schools I object to the lack of provision for doctors surgeries

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

Attached documents:

Comment ID: PSLPA16/2335  Respondent: 15140417 / Jeff Greenwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 any immediate provision for Doctors Surgeries.

I object to the lack of provision for new schools

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

Attached documents:

Comment ID: PSLPA16/152  Respondent: 15140481 / Jayne Grant  Agent:
Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

7) I object to the lack of provision of new schools
8) I strongly object to lack of provision of doctors surgeries

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

Attached documents:

Comment ID: PSLPA16/2344    Respondent: 15140641 / Sandra Greenwood    Agent:

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 any immediate provision for Doctors Surgeries.
I object to the lack of provision for new schools

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

Attached documents:

Comment ID: PSLPA16/2617    Respondent: 15140705 / Simon Moxon    Agent:

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

I can see no proper provision for new schools, where will children be educated? All local schools are operating at or very close to capacity.

No provision for increased Doctor’s surgeries, waiting lists are long enough and these proposals will completely overwhelm any semblance of an efficient GP service. This will put peoples lives and general wellbeing at risk.

No provision for extra Policing in the area and, having retired from Surrey Police less than a month ago, I can assure you there is no plan to increase Police numbers to cover the proposed increase in the local population. Like every Force in the country Surrey Police are massively overstretched and suffering from recent government cuts to the Policing bill which will continue for the life of this parliament. This will put peoples safety at risk.

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

Attached documents:

Comment ID: PSLPA16/158    Respondent: 15141409 / Barry Summerfield    Agent:

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

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<td>Respondent: 15143073 / Sharon Rankin</td>
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<td>2. I OBJECT to the lack of any immediate provision for Doctors Surgeries.</td>
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<th>Comment ID: PSLPA16/173</th>
<th>Respondent: 15143393 / Susan Mounsey</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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<tr>
<td>1. I OBJECT to the lack of immediate provision for new schools.</td>
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<tr>
<td>2. I OBJECT to the lack of any immediate provision for Doctors Surgeries.</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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<tr>
<th>Comment ID: PSLPA16/175</th>
<th>Respondent: 15143553 / Danielle Rixon</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
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<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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<tr>
<td>I object in addition to the lack of necessary provisions including schools and Doctors Surgeries.</td>
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<tr>
<th>Section page number</th>
<th>Document page number</th>
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<tr>
<td>Page 148 of 278</td>
<td>162</td>
</tr>
<tr>
<td>Comment ID: PSLPA16/2260</td>
<td>Respondent: 15144545 / Stacey Maxwell</td>
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</tbody>
</table>

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/189</th>
<th>Respondent: 15146817 / Sue B</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
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</tbody>
</table>

I object to the lack of provision for improvements to the traffic congestion on the A3.
I object to the lack of provision to improve traffic congestion at the junction of the A3 and M25.
I object to the lack of any immediate provision of Doctors surgeries.
I object to the lack of any immediate provision of new schools.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/190</th>
<th>Respondent: 15146913 / Nicola Barber</th>
<th>Agent:</th>
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<tbody>
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</tbody>
</table>

1. Inadequate consideration given to Infrastructure Delivery. I reaffirm my objections to the revised plan for the Former Wisley Airfield/Three Farms Meadow site at Ockham. Despite having been previously unanimously rejected by Guildford Borough Council planners, it has not only been included, but enlarged on the new draft plan. Inadequate consideration is being given to supporting services, including schools, medical centres, public transport including rail capacity and railway station parking, which are already overloading. Housing growth needs to be organic and sustainable in the context of other resources; this development is not. The viability of the proposal also relies upon the Road Investment Strategy by the UK Highways Agency to develop the A3/M25 interchange. These have not been finalised, and do not consider the additional burden created by the Wisley Airfield, Garlick’s Arch and Gosden Hill developments which are explicitly designed to empty their traffic
burden onto that interchange. Four thousand or more extra cars using this intersection every morning and evening will cause chaos. The natural consequence of this overloading will be the overspill onto trunk roads and minor lanes, which not only are not designed for such heavy use. There will be increased risk to vulnerable road users such as pedestrians, riders and cyclists on crowded routes with no footway and few cycle tracks.

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

Attached documents:

Comment ID: pslp173/786  Respondent: 15147809 / Elmbridge Borough Council (Suzanne Parkes)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Appendix C – Infrastructure Schedule

Following the removal of Table 1 and the recognition with the Local Plan that the strategic development sites are likely to be delivered during the 6-10 and 11-15 periods, the delivered when dates as set out in the appendix need to be consistent with this. For example, PED2 still refers to Years 1-15.

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

Appendix C – Infrastructure Schedule
Following the removal of Table 1 and the recognition with the Local Plan that the strategic development sites are likely to be delivered during the 6-10 and 11-15 periods, the delivered when dates as set out in the appendix need to be consistent with this. For example, PED2 still refers to Years 1-15.

Attached documents:

Comment ID: PSLPA16/1342  Respondent: 15147841 / N Golbengian  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

Comment ID: PSLPA16/231  Respondent: 15155201 / Ann Lay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Guildford Local Plan for the following reasons:

[...]

9.) The proposed Infrastructure Schedule (Appendix C)

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

Attached documents:

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**Comment ID:** PSLPA16/236  **Respondent:** 15155617 / David Vallath-Patel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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**Comment ID:** PSLPA16/248  **Respondent:** 15157601 / Barbara Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:

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**Comment ID:** PSLPA16/262  **Respondent:** 15160769 / Elliott Stuart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The lack of proposed new infrastructure and facilities to cope with the needs of those already living in these areas, without increasing the demand by intensifying the housing;

I object to the lack of immediate provision for new schools, GP surgeries etc. locally;

I object to the potential six main development sites contained in the Draft Local Plan which are located in and around the Horsleys.

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

Attached documents:

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8) I object to the Infrastructure Schedule (Appendix C)

The Plan takes no account of the infrastructure needed for the Garlick's Arch site.

  e.g. utilities, sewerage and local services.

9) I object to the lack of provision for increasing the size of the local Medical Centre.

The Villages Medical Centre is already full.

10) I object to the lack of provision of additional School places.

The local schools are being enlarged to take account of the projected figures for the current population of Send.

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

Attached documents:

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9.) I object to the lack of consideration of infrastructure improvement. It does not make any sense to have a plan that effectively merges all villages along the A3 from Wisley to Blackwell Farm. In order to make it sound, very significant infrastructure improvements would need to be made, including, but not restricted to, completely rebuilding the A3/M25 intersection to make it freer flowing and an additional lane to be added to the M25 in either direction. The A3 through Guildford would need to become 3 lanes too, and the junction with the A31 Hog’s Back significant altered / improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
H. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site.

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

Attached documents:

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Comment ID: PSLPA16/396  Respondent: 15198081 / Anita Hogben  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

5. I OBJECT TO the lack of immediate provision for new schools.

6. I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

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

Attached documents:

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Comment ID: PSLPA16/401  Respondent: 15198337 / Jack Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/414  Respondent: 15205569 / Mark Gurdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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<tr>
<th>Comment ID: PSLPA16/427</th>
<th>Respondent: 15205729 / John Walker</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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</table>

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/419</th>
<th>Respondent: 15205921 / Elizabeth Howlett</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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I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick's Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

**Attached documents:**

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<th>Comment ID: PSLPA16/422</th>
<th>Respondent: 15206497 / Vivien Bancroft</th>
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</table>

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/447  Respondent: 15208417 / Colin Green  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

11) I OBJECT TO the lack of immediate provision for new schools

12) I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

This plan effectively merges all villages along the A3 from the M25 to the Hogs Back with no provision for any improvements to either the A3 or local roads.

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

Attached documents:

Comment ID: PSLPA16/450  Respondent: 15208513 / Lauren Green  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

11) I OBJECT TO the lack of immediate provision for new schools

12) I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

This plan effectively merges all villages along the A3 from the M25 to the Hogs Back with no provision for any improvements to either the A3 or local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
11) I OBJECT TO the lack of immediate provision for new schools

12) I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

This plan effectively merges all villages along the A3 from the M25 to the Hogs Back with no provision for any improvements to either the A3 or local roads.

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

15. We object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/508  Respondent: 15231489 / Alan Road  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools.

I object to the lack of immediate provision for Doctors Surgeries.

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

Attached documents:

Comment ID: PSLPA16/510  Respondent: 15232193 / Elaine Brightman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools.
- I OBJECT TO the lack of any immediate provision for Doctors Surgeries.

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

Attached documents:

Comment ID: PSLPA16/524  Respondent: 15233633 / Hilary Head  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

6) I object to the lack of any immediate provision for new schools.

[...]

8) I object to the lack of any immediate provision for Doctors surgeries.

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

Attached documents:

Comment ID: PSLPA16/530  Respondent: 15234017 / Martin Head  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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 immediate provision for new schools
- I object to the lack of any immediate provision for Doctors Surgeries

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

Attached documents:

Comment ID: PSLPA16/533  Respondent: 15234177 / Brianne Vally  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. I object to the lack of immediate provision for new schools. For instance, Surry's primary school population has risen by more than 10,000 since 2010 and by 2,200 in 2015 alone.
2. I object due to the congestion that the proposed development will have on an already over loaded road network. I feel changes to existing trunk roads especially A3/M25 will have to be made prior to further development being considered/suggested. Moreover the rural roads around ripley, send and clandon are already overloaded with through traffic. These are narrow and in poor condition. Most don't currently have a footpath nor cycle path. There is no plan to improve these hence I object.

1. I object to the lack of any immediate provision for doctors surgeries. I feel the plan does not identify suitable infrastructure improvements in lieu of the sheer scale of proposed development.

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

Attached documents:

Comment ID: PSLPA16/537  Respondent: 15234273 / Martin Jones  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

6. I object to the lack of any immediate provision for doctors surgeries. I feel the plan does not identify suitable infrastructure improvements in lieu of the sheer scale of proposed development.

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

Attached documents:

Comment ID: PSLPA16/552  Respondent: 15238881 / Stephen John Tully  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to lack of immediate infrastructure: schools, doctors surgeries etc.

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

Attached documents:

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<th>Comment ID: PSLPA16/557  Respondent: 15239425 / Debbie Preece  Agent:</th>
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I object to the lack of immediate provision for new schools.

I object to the lack of any immediate provision for Doctors Surgeries.

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

Attached documents:

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<th>Comment ID: PSLPA16/569  Respondent: 15240161 / R O Moore  Agent:</th>
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</table>

10. The proposed Infrastructure Schedule (Appendix C)

The Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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: PSLPA16/590  Respondent: 15245697 / Justine Butler  Agent:</th>
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</table>

I OBJECT TO the lack of immediate provision for new schools.

I OBJECT TO the lack of immediate provision for doctors surgeries.

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

Attached documents:
Comment ID: PSLPA16/599  Respondent: 15246497 / G F Bennett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools
I object to the lack of any immediate provision for doctors surgeries

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

Attached documents:

Comment ID: PSLPA16/609  Respondent: 15248481 / Jamie McCallister  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

10. I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/619  Respondent: 15253217 / W Orchard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/632  Respondent: 15254113 / R Orchard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

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1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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<table>
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<tr>
<th>Comment ID: PSLPA16/647</th>
<th>Respondent: 15256705 / R.V. Vickers</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

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<th>Comment ID: PSLPA16/650</th>
<th>Respondent: 15256769 / Freda Boyle</th>
<th>Agent:</th>
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There is no clear consideration to the infrastructure requirements. The current infrastructure is already at breaking point and becoming inadequate. Further proposed housing levels, roads, doctors and schools will be unable to cope. No adequate consideration has been given for the proposed growth of housing and residents. The A3 and surrounding roads including the A247 which are already at 100% capacity.

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

Attached documents:

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<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/651</th>
<th>Respondent: 15256833 / C J Vickers</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/674  Respondent:  15263073 / James Walker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/678  Respondent:  15263905 / Philip Walker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/680  Respondent:  15264001 / Robert Peake  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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:
There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

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

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<th>Respondent: 15275201 / Jennifer Morritt</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15278465 / Chris Wright</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/739</th>
<th>Respondent: 15280321 / Sport England (Owen Neal)</th>
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Draft Infrastructure Delivery Plan
The Council does not have an up-to-date assessment of the need for open space, sports and recreation facilities required by paragraph 73 of the NPPF. Sport England considers that additional work is required to determine what additional indoor and outdoor sports facilities are required in the Borough and this should inform the Infrastructure Schedule.

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

Attached documents:

Comment ID: PSLPA16/761  Respondent: 15284993 / Samantha Thompson  Agent:

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

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/765  Respondent: 15285121 / Audrey Boughton  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: PSLPA16/768  Respondent: 15285345 / Mike Boughton  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: PSLPA16/1064  Respondent: 15292129 / Shirley Wilson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object that lack of local of immediate provisions for new schools has not been thought about before putting the proposed plan have been put forward.

I object that the lack of any immediate provision for doctor surgeries and how the NHS hospital health services would cope with the increase of people needing to use these facilities.

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

Attached documents:

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Comment ID: PSLPA16/788  Respondent: 15294113 / M J Hickman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 provision for schooling, health provision, water/drainage requirements. Large developments cause difficulties in disposal of surplus water which cannot drain through concrete.

The scheme is unnecessarily large and will cause a huge, irreversible loss of Green belt and open space, and cause many infrastructure problems, particularly traffic and access.

I hope that our fears and concerns will be completely and thoroughly considered.

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

Attached documents:

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Comment ID: PSLPA16/801  Respondent: 15295809 / David Lees  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed Infrastructure Schedule.

Plan does not take into account Garlick's Arch (A43) from an infrastructure perspective (nothing in Appendix C). It is therefore not fit for purpose.

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

**Attached documents:**

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**Table:**

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<tr>
<th>Comment ID: PSLPA16/804</th>
<th><strong>Respondent:</strong> 15296545 / Catherine Lees</th>
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<th>Comment ID: PSLPA16/805</th>
<th><strong>Respondent:</strong> 15297249 / Christine Gates</th>
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<td>I object to the lack of immediate provision of schools. Children are already suffering from being housed in cramped, 'temporary' classrooms that have been in situ for years.</td>
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<tr>
<td>12) I object to the lack of immediate provision of doctors surgeries which are over subscribed in this area.</td>
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<th>Comment ID: PSLPA16/814</th>
<th><strong>Respondent:</strong> 15298017 / Margaret Cousins</th>
<th><strong>Agent:</strong></th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/817  
Respondent: 15298497 / John David Scott  
Agent:  

Document:  
Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  

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: PSLPA16/842  
Respondent: 15300385 / Mark Harding  
Agent:  

Document:  
Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  

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

1. I OBJECT TO THE LACK OF IMMEDIATE PROVISION FOR NEW SCHOOLS
8. I OBJECT TO THE LACK OF ANY IMMEDIATE PROVISION FOR DOCTORS SURGERIES

Our legacy should not be to destroy the special villages and countryside environment we have all chosen to live in.

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

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<th>Comment ID: PSLPA16/887</th>
<th>Respondent: 15304897 / Richard Baker</th>
<th>Agent:</th>
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<th>Comment ID: PSLPA16/903</th>
<th>Respondent: 15304929 / Rosemary Wood</th>
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<th>Comment ID: PSLPA16/895</th>
<th>Respondent: 15312769 / Norah Johnson</th>
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<th>Comment ID: PSLPA16/898</th>
<th>Respondent: 15312961 / Alison Johnson</th>
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<th>Respondent: 15314305 / Andrew Dennis</th>
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<th>Comment ID: PSLPA16/928</th>
<th>Respondent: 15315009 / Edward Dennis</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1046  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43) so, the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

Comment ID: PSLPA16/949  Respondent: 15321729 / Fiona Keywood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools.

I object to the lack of the immediate provision of Doctors surgeries

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

Attached documents:

Comment ID: PSLPA16/950  Respondent: 15321985 / Theo Keywood  Agent: Colin Keywood

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools.

I object to the lack of the immediate provision of Doctors surgeries

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

Attached documents:
Comment ID: PSLPA16/962  Respondent: 15322017 / Colin Keywood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools.
I object to the lack of the immediate provision of Doctors surgeries.

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

Attached documents:

Comment ID: PSLPA16/955  Respondent: 15323841 / Claire Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/964  Respondent: 15324705 / Isobelle Keywood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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I object to the lack of immediate provision for new schools.
I object to the lack of the immediate provision of Doctors surgeries.

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

Attached documents:

Comment ID: PSLPA16/983  Respondent: 15326465 / James Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Attached documents:

Comment ID: PSLPA16/1021  Respondent: 15329505  Martine Early  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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I object to the lack of the immediate provision of Doctors surgeries.

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

Attached documents:

Comment ID: PSLPA16/1038  Respondent: 15340929  Claire Smylie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/1062  Respondent: 15342401  M.J. Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/1060  Respondent: 15342753 / Mike Milne  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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 any suitable planned infrastructure.

Would you please ensure that my comments are given to the Planning Inspector

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

Attached documents:

Comment ID: PSLPA16/1072  Respondent: 15345281 / Alexandra Murphy  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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: PSLPA16/1074  Respondent: 15347937 / Margaret Brazier  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
7. Traffic in the village is appalling, delays and queuing is every day and when events are held at the local private school in Ockham Road North, East Lane (from which much of the proposed development is targeted) becomes a dangerous car park.

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

Attached documents:

Comment ID: PSLPA16/1075  Respondent: 15348033 / Peter Nicholas  Agent:

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C).

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough, it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site.

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

Attached documents:

Comment ID: PSLPA16/1083  Respondent: 15348481 / Donna Styles  Agent:

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

11. I OBJECT TO – the lack of any immediate provision for new schools.

12. I OBJECT TO – the lack of immediate provision for Doctors Surgeries.

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

Attached documents:

Comment ID: PSLPA16/1087  Respondent: 15349281 / Steve Aptel  Agent:

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

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3343  **Respondent:** 15349281 / Steve Aptel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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:** pslp173/95  **Respondent:** 15349281 / Steve Aptel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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:** PSLPA16/1105  **Respondent:** 15351617 / Patricia George  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. The plan is unsound and the road network is unplanned and purely aspirational.

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

Attached documents:
Lack of specific details of essential infrastructure - drainage being the most serious, but all of the communal facilities needed to sustain a large residential 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 lack of immediate provision for new schools.

I object to the lack of any immediate provision for doctors surgeries.

I object to the local plan as the development proposed is not sustainable.

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

Attached documents:

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17. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:
1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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: PSLPA16/1183</th>
<th>Respondent: 15370497 / Edward Scott</th>
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1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

Attached documents:
3. The infrastructure is already overloaded and would not be able to support the number of houses being proposed.

I would be pleased if you could take note of my objections.

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

Attached documents:

---

22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:
1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

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<table>
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<th>Comment ID: PSLPA16/1290</th>
<th>Respondent: 15386017 / Gareth Sinnett</th>
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<th>Respondent: 15386337 / Edna Slater</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

10. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements of the Local Plan in order to comply with the Statutory Regulation. There is no schedule for Garlick’s Arch (site A43), so the Plan takes no account of the infrastructure required for this site. I maintain that this infrastructure schedule is not fit for purpose and I therefore object to this Plan as being inherently unsound.

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 Infrastructure Schedule (Appendix C)

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

Attached documents:

Comment ID: PSLPA16/1386  Respondent: 15399041 / Sue Ely  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/1400  Respondent: 15400961 / Joan Plumtree  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for new schools.

I object to the lack of any immediate provision for doctors surgeries.

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

Attached documents:

Comment ID: PSLPA16/1412  Respondent: 15405857 / Raymond Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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:
development of the frightening level proposed is considered, fully costed and detailed infrastructure plans for items such as new schools, Medical Centres etc. must be clear.

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

Attached documents:

Comment ID: PSLPA16/1477  
**Respondent:** 15408513 / Brian Rawling  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

15. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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Comment ID: PSLPA16/1490  
**Respondent:** 15420833 / Marjorie Moss  
**Agent:**

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

Attached documents:

Comment ID: PSLPA16/4059  
**Respondent:** 15421249 / Mike Hall  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

There doesn’t seem to be a plan to address congestion, especially in the centre and the RSCH/research park area. Until there is, the local plan is not ready to be inspected.
A3 through traffic needs additional lanes and separation from local traffic

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

Attached documents:

Comment ID: PSLPA16/1494  Respondent: 15422145 / Orlando Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/4064  Respondent: 15422145 / Orlando Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Attached documents:

Comment ID: PSLPA16/1501  Respondent: 15422529 / David Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:
England alone there would be no local level control over if/when/how the scheme was delivered. This is an existing concern for other schemes including SRN2 and SRN3 (Stoke interchange and M25 J10/A3 interchange), where Highways England have sole responsibility.

We also have concerns over the changes in funding in policies SRN2 and SRN3. While we 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, we are 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 our 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:

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Comment ID: PSLPA16/1532  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C).

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the Plan depends. For each of the Key Allocated Sites in the Borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/1529  Respondent: 15427745 / Barry Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

The Plan does not adequately, or all at, address the issues around the provision of services - gas, electricity, waste management, fresh water, effluent, and surface water all of which would require major works affecting, in particular, the Burpham area.

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

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<tr>
<td>I <strong>object</strong> to the proposed increase in household with no provision for General Health services.</td>
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</table>
You have not addressed any of the infrastructure improvements that will need to be put in place BEFORE any development begins; sewerage, water, power and road. There are major transport issues unresolved such as the need for a tunnel on the A3 to alleviate the major bottle neck that is Guildford. The positioning of the entrance for such a tunnel needs to be established BEFORE any housing uses up practical sites. If Hindhead can push for and get a tunnel then why hasn't Guildford Council!

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

Attached documents:

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Comment ID: PSLPA16/1577  Respondent: 15433569 / Jennifer Beddoes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the 2016 Draft Local Plan as it has no regard to schools required, additional medical or hospital facilities which would be necessary to make this plan sustainable.

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

Attached documents:

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Comment ID: PSLPA16/1595  Respondent: 15434241 / Valerie Sowerby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/1594  Respondent: 15434273 / Brian Crosby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on but there is no schedule for Garlick’s Arch (A43), so the Plan does not take no account of the infrastructure required for this site and is therefore not fit for purpose.

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

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Why is only 1/4 of the CIL funds being allocated to such important issues. When you consider a new school in Effingham was going to cost around £20 million the funding is totally inadequate. Also if such a massive re-structuring of the Guildford Borough is going to be undertaken where is the financial plan. The business sector would never consider such a plan without ensuring the funding, it seems funding does not enter the equation in the public sector which probably explains why we are in such a mess

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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13. I object to the proposed Infrastructure Schedule (Appendix C)

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There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

**Attached documents:**

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**Comment ID:** PSLPA16/1744  **Respondent:** 15449889 / Harriet Bell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

**Attached documents:**

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**Comment ID:** PSLPA16/1773  **Respondent:** 15451041 / Iain Bell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

**Attached documents:**

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**Comment ID:** PSLPA16/1775  **Respondent:** 15451457 / Camilla Bell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**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: PSLPA16/3493  Respondent: 15454881 / Mark Fielder  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Whilst the Infrastructure Schedule sets out the key infrastructure requirements upon which the plan depends, there appears to be no schedule for Garlick’s Arch (A43). This indicates that the Plan takes no account of the infrastructure required for this site. As a result of this omission it is not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/3605  Respondent: 15454945 / Claire Cassar  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule defines the key infrastructural requirements upon which the plan is dependent. However, no such schedule for Garlick’s Arch (A43) is apparent. This would lead me to conclude that that the Plan does not take account of the infrastructure required for this site. As a result of this omission the plan is not viable.

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

Attached documents:

Comment ID: PSLPA16/1816  Respondent: 15455233 / Andrew Hamilton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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Attached documents:

Comment ID: PSLPA16/1834  Respondent: 15457441 / Margaret Lee  Agent:
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1. SRN1 and SRN 6 should be reinstated.
2. The addition of LRN 23, LRN24 and LRN25 is supported.
3. The funding sources for many of the Local Road Schemes have been changed to ‘Developer’ only. The highway authority, SCC, is not proposing any schemes of its own. Is this due to lack of funds, or a belief that nothing more is needed?

The addition of BT5 and BT6 is supported.

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

Attached documents:

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Comment ID: PSLPA16/1931   Respondent: 15461633 / Anna Wood   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/1948   Respondent: 15462017 / Kevin Rhoades   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

10. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/1965   Respondent: 15462785 / Thomas McMinn   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Attached documents:
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Attached documents:

Comment ID: PSLPA16/3757  Respondent: 15478209 / Sally Daboo  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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Attached documents:

Comment ID: PSLPA16/2244  Respondent: 15479681 / George Smith  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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Attached documents:

Comment ID: PSLPA16/2247  Respondent: 15479777 / Alexandra Trebilco  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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| Comment ID: PSLPA16/2248  Respondent: 15479809 / James Trebilco  Agent: |
|--------------------|---------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule |
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| Comment ID: PSLPA16/2252  Respondent: 15479905 / K Dormer  Agent: |
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| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule |
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| Comment ID: PSLPA16/2253  Respondent: 15479969 / W J Edwards  Agent: |
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| Comment ID: PSLPA16/2255  Respondent: 15480033 / Tanya Wicks  Agent: |
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Attached documents:

Comment ID: PSLPA16/2256  
Respondent: 15480065 / Annie Stanley  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  
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Comment ID: PSLPA16/2258  
Respondent: 15480097 / E Swapper  
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Comment ID: PSLPA16/2257  
Respondent: 15480129 / D Swapper  
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Comment ID: PSLPA16/2261  
Respondent: 15480161 / D Crowcey  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  
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Comment ID: PSLPA16/2282  Respondent:  15480897 / Graham Smith  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/2283  Respondent:  15480961 / Alex Smith  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/2286  Respondent:  15481025 / Marion Kincses  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Attached documents:

Comment ID: PSLPA16/2287  Respondent:  15481057 / P M Stephens  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

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

Attached documents:

Comment ID: PSLPA16/2284  Respondent: 15481185 / Ray Avery  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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: PSLPA16/2285  Respondent: 15481217 / C R Avery  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

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

Attached documents:

Comment ID: PSLPA16/2200  Respondent: 15481409 / Amy F Corstin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/2275  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Attached documents:

Comment ID: PSLPA16/2300  Respondent: 15483713 / Claire Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

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There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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Attached documents:

Comment ID: PSLPA16/2324  Respondent: 15485281 / Fiona Stobart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/2330</th>
<th>Respondent: 15485345 / Ruth Beavington</th>
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<th>Comment ID: PSLPA16/2339</th>
<th>Respondent: 15485473 / Eilish Smith</th>
<th>Agent:</th>
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<th>Comment ID: PSLPA16/2354</th>
<th>Respondent: 15485921 / Chris Nairn</th>
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<td>I OBJECT to the obvious lack of provision and/or planning for Doctors, Schools and more importantly the blatant disregard of vehicle and road infrastructure planning, which surely should be first, ahead of any local planning drafts.</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: PSLPA16/2384</th>
<th>Respondent: 15488033 / Bradley Smith</th>
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The phasing of housing development and transport infrastructure are out of kilter. Gosden Hill is shown to be phased in from 2021 onwards but improvements to the A3 are to be delivered in the period 2023-2027. There will be a huge period of time where the existing A3 has to cope with additional demand. As a daily user of the A3, this will result in me having to adjust my schedule significantly to compensate for the extra traffic that I will encounter. As we move into a more 'sustainable' era, motorists sitting idle with their engines running for longer surely doesn't help achieve this goal? Keeping people moving will help dampen this environmental impact.

Not only is this out of kilter but the allocation of the most suitable site for the proposed A3 tunnel entrance for housing is shortsighted and a detriment to the whole of Guildford who desperately need to have the A3 traffic jams solved.

I hope you take this objection, and the many others, seriously, and abandon the proposed plans to the Burpham & wider Guildford area.

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

Attached documents:

Comment ID: PSLPA16/3396  Respondent: 15495361 / Therese Elizabeth Hill  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is not enough provision for schools

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

Attached documents:

Comment ID: PSLPA16/2421  Respondent: 15495649 / Stephen Cruse  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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: PSLPA16/2468  Respondent: 15497505 / Jyoti Nanda  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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Attached documents:

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These comments on the Proposed Local Plan (“the Plan”) are submitted by Wanborough Parish Council. They relate to the proposed developments to provide 1800 homes etc. at Blackwell Farm and 1100 homes etc. on “land to the South of Normandy and North of Flexford”.

Under the Infrastructure Act 2015 the Dept of Transport has published a Road Investment Scheme and we note that this is government funded and “ring-fenced”. However that commitment was made before the vote to leave the European Union and there must be some question as to whether those commitments will still be honoured. Within our area we note that there are three road schemes: 1) To commence in 2015-2020 - upgrade of Junction 10 M25/A3 interchange, and 2) Upgrade M25 to four lanes junctions 10-16, 3) To commence 2020-2025 – improve A3 from A320 to A31 ie through Guildford. It is said that this could involve a tunnel or road widening scheme but is subject to a feasibility study.

Pages 108-114 of the Plan appear to acknowledge that improvements to the A3 must be made before the two developments referred to above can proceed. Can you please confirm that this is the position? If not, we consider that the proposed developments are entirely inappropriate, as the existing road infrastructure cannot cope with present traffic flows, let alone the addition of vehicles from the proposed 2900 new homes.

We note the proposals in respect of Blackwell Farm, including the “Sustainable Movement Corridor” for buses, bikes and pedestrians and a new station by 2018-19. That date looks very optimistic and the station is dependent on funding from Network Rail. Is that funding secure and confirmed?. As for roads, we note that there will be one into Guildford via the Hospital, but the main road access (and in our view a fatal flaw with this proposed development) will be by a junction from the A31 controlled by traffic lights or to quote the Plan “via the existing at a realigned junction of the A31 and the Down Place access road signalised”. The A31 as it approaches the A3 is gridlocked for large parts of each working day from 6 am onwards. Traffic lights and the additional traffic from the proposed Blackwell Farm (and Normandy/Flexford) development would only exacerbate the existing extreme congestion.

We also have considerable concerns in relation to how the proposed Normandy/Flexford development will impact on the road infrastructure.. We note the proposed cycleways and “opportunities to improve Wanborough Station”, and that “interventions will be required” to mitigate highway performance issues. We are however very concerned at the lack of any detailed proposals. The reality is that traffic flows through Wanborough and up Wanborough Hill will increase considerably. The junction at the top of Wanborough Hill with the B3000 is already unable to deal with present traffic flows, as is the junction with the B 3000 and the westbound slip road from the A31.

We note from Appendix C that Guildford Station will get improved capacity and interchanges between 2024 and “post plan period”. It appears that these will be delivered between 2018 and 2029 (elsewhere it says 2018/19, see above). What is the timescale and is the funding agreed and secure?

We are also confused by the proposal that the A3 slip roads at Tesco will be widened between 2017 and 2020. How does this fit with the proposal to widen the A3 or put it in a tunnel?
Having given careful consideration to these two proposed developments we are of the firm view that neither of these developments should be given further consideration unless and until viable road and rail transport solutions have been properly planned and full funding put in place.

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

Attached documents:
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**Attached documents:**

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<th>Comment ID: PSLPA16/2500</th>
<th>Respondent: 15502817 / Linda Margaret Cutbush</th>
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Comment ID: PSLPA16/2576   Respondent: 15504929 / William Scott   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Attached documents:

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Comment ID: PSLPA16/2613   Respondent: 15506785 / Maverick Hornblow   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to -

[...]

7) lack of immediate provision needed for new schools

8) lack of any immediate provision for doctors surgery S

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

Attached documents:

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Comment ID: PSLPA16/2616   Respondent: 15506817 / Reno Hornblow   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/2634  Respondent: 15507553 / David Lawton Garner  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule 
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Comment ID: PSLPA16/2652  Respondent: 15508385 / Susan Woodman  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The existing slip road is to become a two way road which will put far more traffic into Burpham that it just cannot take.
What changes (2016)/further amendments (2017) do you suggest should be made to the document? 
Attached documents:

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Comment ID: PSLPA16/2656  Respondent: 15508993 / Alice Norman  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Transport
A realistic traffic solution must be put in place before any agreement is made on housing - Particularly the decision regarding the A3 tunnel.

The proposals for the infrastructure for transport are insufficient and inappropriate – there is not enough space for the suggestions of bus lanes and cycle lanes on both sides of London Road in Burpham – it does not have the capacity for the current levels of traffic - the traffic is solid along the London Road and peak times and school start and end times already. So the impact on the environment will be worse not better with even more vehicles stationary while they move through Burpham.

After the building of Aldi in Burpham there is undeniable proof that the methods of calculation used by GBC and SCC to predict traffic movements are seriously flawed and incorrect – there is much congestion around the A3100/A2234 roundabout due solely to Aldi customers.

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Attached documents:

Comment ID: PSLPA16/3651  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/2743  Respondent: 15571585 / Bradley Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Transport:

[...]

The proposed Sustainable Movement Corridor is simple unsound and cannot be delivered due to the narrow roads and pinch points on an already very congested route through Burpham.

Of further note is that the proposed Gosden Hill development of 2000 houses plus offices, school etc will add significant pressure to the already congested London road and New Inn Lane. The increase in solution and noise is unacceptable.

The phasing of the proposed Gosden Hill development is in advance of proposed improvements to the A3. This makes no sense.

The major transport issues around Guildford need to be resolved before any further development is considered, these include the proposed A3 tunnel, new river crossing, a workable central bus terminal and a rail station at Merrow.
Comment ID: PSLPA16/2749  Respondent: 15571617 / Bruce Garbutt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

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Much of the Infrastructure is aspirational and uncommitted – it is not reasonable for other plans to be specific (eg house locations) and for the corresponding infrastructure to be

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

Attached documents:

Comment ID: PSLPA16/2751  Respondent: 15571745 / Hazel Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Attached documents:

Comment ID: PSLPA16/2759  Respondent: 15571937 / S Bennell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Attached documents:

Comment ID: PSLPA16/2800  Respondent: 15574337 / Jacqueline Redknap  Agent:

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Comment ID: PSLPA16/2818  Respondent: 15575009 / Tony Redknap  Agent:

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Comment ID: PSLPA16/2831  Respondent: 15575681 / John Francis  Agent:

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I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no provision for Garlicks arch so the Plan takes no account of the infrastructure needed for this site. It is therefore not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/2848  Respondent: 15576641 / Hilary Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Councils cannot afford to repair existing roads, which currently resemble Third World roads in places with all the potholes, so with a huge increase in traffic, how will they ever keep up. The narrow country roads in the area are dangerous now to cyclists and walkers, without extra traffic.

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

Attached documents:

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Comment ID: PSLPA16/2896  Respondent: 15579137 / Nicodemus Brian Rhyner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

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Comment ID: PSLPA16/2898  Respondent: 15579361 / Caroline May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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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 / Appendix C: Infrastructure Schedule

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

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There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

Comment ID: PSLPA16/3000  Respondent: 15583585 / Josephine Rooke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

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There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

Comment ID: PSLPA16/3001  Respondent: 15583617 / Deborah Gillam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

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There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

Comment ID: PSLPA16/3008  Respondent: 15583809 / Nigel Stephenson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. **I object to the proposed Infrastructure Schedule (Appendix C)**
   
   The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick's Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

   **Attached documents:**

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**Comment ID:** PSLPA16/3009  **Respondent:** 15583841 / Catherine Young  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

   Whilst the trains run a frequent service to both London and Guildford, access to the station car park is hazardous and parking on a weekday is very limited.

   I do believe that GBC need to carefully consider where all the cars are going to go should these new developments proceed. The road I live down is already crowded with residents already having to park across pavements, preventing people from walking along the pavement, and blocking access for the disabled. This is the same in neighboring Farley’s Close and also along Long Reach itself – probably not GBC but Surrey County Council – but at the end of the day, this area cannot take anymore vehicles – we are at bursting point!

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

   **Attached documents:**

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**Comment ID:** PSLPA16/3013  **Respondent:** 15583937 / Brian Astley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

   I object to the 2016 draft local plan on the following grounds

   - the lack of immediate provision for new schools.
   - the lack of any immediate provision for Doctors Surgeries.

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

   **Attached documents:**

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**Comment ID:** PSLPA16/3023  **Respondent:** 15584161 / Alexandra Elson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/3030  Respondent: 15584481 / Jeremy Hamilton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/3043  Respondent: 15584833 / Maria Fort  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/3046  Respondent: 15584961 / Helen Meredith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/3121  **Respondent:** 15587105 / John Downes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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:** PSLPA16/3089  **Respondent:** 15585793 / Mark Horigan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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:** PSLPA16/3128  **Respondent:** 15587233 / Jane Clark  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Attached documents:

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43), which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities, roads, sewerage and doctors, etc. are already at or close to capacity, without an infrastructure plan the proposals are simply unsustainable and are therefore not fit for purpose.

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

Attached documents:

APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s
Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/3229  
**Respondent:**  15589665 / Anna Worsley  
**Agent:**  
**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/3235  
**Respondent:**  15589889 / Keith Macdonald  
**Agent:**  
**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/3251  
**Respondent:**  15590241 / Claire Tallis  
**Agent:**  
**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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: PSLPA16/3339  Respondent: 15593761 / Celestyn Kwapisiewicz  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3372  Respondent: 15594817 / Toni Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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Comment ID: PSLPA16/3388  Respondent: 15595681 / Willemien Downes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
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<tr>
<td>You can’t build this many houses in one area without doing extensive traffic surveys on the area. All these houses will have one or two cars and this needs some planning. Car parking needs to be provided, roads need to be improved. When is this all happening?</td>
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Comment ID: PSLPA16/3501  Respondent: 15603905 / Michael Douek  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/3520  Respondent: 15604289 / Lesley Pitt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/3517  Respondent: 15604449 / Annabel Curling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/3526  Respondent: 15606657 / Kim Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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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: PSLPA16/3535  Respondent: 15607425 / Louise Quy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends upon. I am shocked to learn that there is no such schedule for Garlick's Arch (A43) which indicates to me that the Plan takes no account of the infrastructure that is required for this site. This cannot be tenable and is not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/3539  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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**Comment ID:** PSLPA16/3614  **Respondent:** 15610465 / Tess Corlett  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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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: PSLPA16/4553  Respondent: 15615489 / Alison Bullman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Roads and Transport

◦ The rail station car park is full during the week/working hours. If the village population were to increase, how would the car park/station facilities cope with the added strain? This also applied to the traffic movements to/from Horsley station to drop off/collect travellers, commuters and school children.
◦ Traffic generated from the proposed new development will be significant, given most households have on average 2 cars.
◦ Journey times will increase significantly on local roads, with jams exiting the A3 and A24 and through the villages.
◦ The roads are already in a terrible state in terms of potholes. Added traffic will make this far worse.
◦ I have huge concerns for safety as I am already too afraid to walk my daughter to and from school as pavements are often too narrow to get my son’s buggy down, cars drive too fast and in the winter months it is too dark due to no street lights. 

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

Attached documents:

Comment ID: PSLPA16/3669  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and does not therefore seem to have been properly considered or constructed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPA16/3690</th>
<th>Respondent: 15616929 / Nigel Wickham</th>
<th>Agent:</th>
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<th>Comment ID: PSLPA16/3698</th>
<th>Respondent: 15617185 / Michelle Mitchell</th>
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<th>Comment ID: PSLPA16/3704</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
<th>Agent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Transport

County council officers continue to work with borough officers, as well as with Highways England and potential developers, on transport matters. This includes transport impact assessment work and identifying mitigation measures to address the transport impacts of development proposed in the Local Plan.

The county council’s highway assessment work indicates that the schemes which are included in the Department for Transport’s Road Investment Strategy March 2015 and identified in the Infrastructure Schedule (Appendix C) are essential to mitigate the impact of the development proposals set out in the Guildford borough Proposed Submission Local Plan. Without such investment, the cumulative impacts of the new development proposed on the Local Plan’s strategic sites on the Strategic Route Network (SRN) could be considered “severe” in the context of the NPPF, as the additional pressure on the SRN is likely to generate safety issues.

The Infrastructure Schedule also identifies a number of new transport infrastructure projects. As these projects are developed and further details regarding their land requirements are known, appropriate action will need to be taken to safeguard the land to allow these projects to be implemented.

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

Attached documents:

Comment ID: PSLPA16/3789  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

APPENDIX C Infrastructure Schedule

Strategic Road Network

Page 278 – re SRN4, SRN9, SRN10

For those elements of infrastructure that are entirely the responsibility of a given developer, Surrey County Council should be deleted from the "Delivered by" column.

Local Road Network

Page 280– LRN3

The new signalised junction from Blackwell Farm site to A31 Farnham Road, would be a Section 278 Agreement, delivered in its entirety by the developer. Surrey County Council should be deleted from the "Delivered by" column.

Local Road Network

Page 280 – re LRN3, LRN4, LRN5, LRN6, LRN7, LRN8

For those elements of infrastructure that are entirely the responsibility of a given developer, Surrey County Council should be deleted from the "Delivered by" column.

Bus Transport

Page 287
Under BT2, Surrey County Council should be deleted from the "Delivered by" column.

We suggest the inclusion two additional BT infrastructure entries relating to the need to provide significant bus networks serving the two east and west urban extensions.

**Active Modes**

**Page 288**

We suggest the inclusion of two additional AM infrastructure entries relating to the need to provide significant cycle and pedestrian permeability improvements linking these extensions into the existing urban fabric.

**OS Open Space**

**Page 298**

We do not consider it appropriate to deal with school playing fields under Open Space. Public access to the playing fields at Gosden Hill will need to be controlled for security and operational reasons.

**PED Primary Schools**

**Page 299**

**PED1**

Re Expansion of Wyke Primary School by 1 additional FE, please add: **“OR RELOCATION OF THE SCHOOL ONTO THE STRATEGIC SITE”**

**Page 300**

**PED6**

Re Ash Grange in the column headed “Delivered when” delete from years 0-5 to Years and add 1 – 10

**SED Secondary Schools**

**SED1**

Under the column headed “Infrastructure Type Infrastructure Project”, the reference in the first sentence to “maxim 6 FE” needs to be amended to state: **“up to 7 FE”**.

To be consistent with the other entries, in the column headed “likely cost and funding source,” please delete: “Developer contributions (from other sites) to fund building”.

It is suggested that wording is added to say that the shared community use of the school playing fields will be secured by a legal agreement.

**Page 301**

**SED2**

Under the column headed Infrastructure Type Infrastructure Project, please remove the words: “(to age 16)” to facilitate flexibility for future provision.

In the column headed “likely cost and funding source” please amend the first entry to read: “Developer to provide serviced land at nil cost and transfer it to SCC.”
SED3

In the column headed “Infrastructure Type Infrastructure Project”, the reference in the first sentence to an “A 7-form entry (7FE) secondary school” needs to be amended to “up to 8 FE to” be consistent with the penultimate bullet point under “Allocation” in Policy A46.

In the column headed “likely cost and funding source”, after the words “…including Blackwell Farm strategic site” we would suggest that the following words are added:

“and the site allocation comprising land to the South and East of Ash and Tongham.”

In the column headed “likely cost and funding source”, please amend the first entry to read: “Developer to provide serviced land at nil cost and transfer it to SCC.”

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

Attached documents:

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Comment ID: PSLPA16/3803  Respondent: 15631105 / Pamela Jacqueline Hagan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I object to the proposed infrastructure schedule (appendix C).

The infrastructure schedule sets out the key requirements that the plan depends on. There is no schedule for Garlick's Arch (A43). This site is, therefore, not fit for purpose.

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

Attached documents:

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Comment ID: PSLPA16/3819  Respondent: 15631553 / Anthony Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

1. I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope.

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

Attached documents:

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Comment ID: PSLPA16/3878  Respondent: 15636481 / Peta Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
There is a lack of precise detail for the proposed infrastructure. There is no timetable indicating its implementation, particularly in reference to the housing.

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

Comment ID: PSLPA16/3933  
Respondent: 15641281 / Paula Redmond  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
I object to the proposed Infrastructure Schedule (Appendix C)  
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:  

Comment ID: PSLPA16/3972  
Respondent: 15645377 / Linda Roberts  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  
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 any immediate provision for new Doctor’s surgeries, the current ones already being under a severe load.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:  

Comment ID: PSLPA16/3983  
Respondent: 15645825 / David Roberts  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  
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 any immediate provision for new Doctor’s surgeries, the current ones already being under a severe load.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:
Comment ID: PSLPA16/4047  Respondent: 15652033 / James Scrace  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 immediate provision for supporting infrastructure mentioned in the Local plan such as schools or doctors Surgeries considering the considerable increase in residents the mass development sites will create.

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

Attached documents:

Comment ID: PSLPA16/4051  Respondent: 15652833 / Don Babington  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/4079  Respondent: 15658465 / Michael Cuell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

The lack of provision of new schools in line with the influx of increased numbers of children can only mean impact on existing schools.

- As per my point above, the lack of immediate provision of doctor surgeries and health care.

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

Attached documents:

Comment ID: PSLPA16/4084  Respondent: 15658497 / Philip Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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 Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

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

Attached documents:

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Comment ID: PSLPA16/4085  Respondent: 15658529 / Trevor Jenkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I refer to the proposed SANG at Tyting Farm and the response from Tyting Society dated July 2016.

I am a member of this society as I am the owner of a house on White Lane [address redacted] which lies on the Western boundary of the proposed access path down from White Lane to the proposed SANG ("WL path").

I fully support the response that the Tyting Society has provided.

I would like to add some clarification to the second point raised in the response - namely "minimising footpath disruption ". Having read the guidelines for individual SANGs there are two "must haves" that I think are particularly relevant.

The first is "a circular walk around the SANG" - this will be met without the need for the WL path. Indeed this seems to add another leg that would take the walker back out of the SANG, which appears illogical.

The second is that "paths must be easily used and well maintained". This raises two concerns about the proposed WL path. The primary issue is that the ground for this path is currently heavily overgrown with mixed quality of fencing, and no access point through the fencing at the Southern end. Therefore appropriate fencing will need to be established on both Western and Eastern incurring a significant one-off cost. Thereafter this path will need to be maintained, entailing annual costs.

The secondary issue is that this path does not pass the test of "easily used" as the only way to access this will be from the path to the North of White Lane, which in turn can only be entered from the Western end near Halfpenny Lane, or the Eastern end by the car park at the end of White Lane. Both of these access points provide a base via existing paths for accessing the circular walk around the SANG, so rendering the White Lane access path basically redundant.

The combination of these two points is that if GBC persists with the extra access, when there is no mandatory requirement to do so, then it is highly likely that this will incur significant capital and running costs with minimal pedestrian traffic using WL path. Such a scenario would reflect badly on GBC's use of funds for this purpose, compared to other more pressing needs.

If you would like further expansion on these points I would be happy to attend any relevant meetings

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

Attached documents:

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Comment ID: PSLPA16/4085  Respondent: 15661761 / Rob Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

The infrastructure currently in place cannot hope to meet the needs of this population growth as well as there being limited scope for development of the infrastructure.

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

Attached documents:

Comment ID: PSLPA16/4525  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The former residential and SANG allocations at Land east of Aldertons were previously identified within the SHLAA and fully supported by GBC and are available and deliverable within the short term and we commend that both allocations are reinstated within the draft Local Plan.

Barratt David Wilson Homes – July 2016

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

Attached documents:

Comment ID: PSLPA16/4164  Respondent: 15666625 / Anna Ruddy  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: PSLPA16/4169  Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Strategic Road Network Infrastructure Allocations SRN9 and SRN10
Background

Send Parish Council object to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road, to be delivered on the land covered by allocation A43a. A review of previous iterations of the Local Plan and the associated evidence base shows that these draft allocations have been made very recently and have not been properly appraised.

The July 2013 Infrastructure Baseline study considered the quality and capacity of the existing infrastructure in the Borough and was used to inform the more detailed infrastructure and transport strategies developed throughout the Local Plan process. Chapter 2 of this document identified the A3 as the key Strategic Road Network (SRN) in the Borough and recognised that the form and standard of the A3 through the borough was deficient in quality and capacity, resulting in congestion and unreliable journey times. This baseline has been used to influence the allocation of sites and how infrastructure could be upgraded.

Local Plan Transport Infrastructure Allocations

The various iterations of the draft Local Plan from October 2013 through to June 2016 set out the following approaches to transport infrastructure in the Borough.

The October 2013 Issues and Options Local Plan recognises the need to balance development with traffic congestion and minimise the impact of traffic on local communities. The document also recognises the need to focus new development that will generate significant movement in locations where the need to travel will be minimised and the use of sustainable transport modes can be maximised. This document does not set out specific allocations for transport infrastructure.

The July 2014 Draft Local Plan contained more detailed policy relating to transport and infrastructure. Policy 17 states that the key infrastructure needed to support plan delivery is provided in the infrastructure schedule at Appendix B. This schedule makes no reference to any requirement for a new junction at the A247. This version of the Local Plan allocates 431 homes in Send and Send Marsh / Burnt Common.

The Guildford Borough, Economy and Executive Advisory Board met on 13 April 2016 to discuss the draft version of the Proposed Submission Local Plan. The supporting briefing note states that delivery of the development contained within the Proposed Submission Local Plan is dependent on the delivery of the necessary infrastructure. The infrastructure schemes that the Council considered to be necessary for the delivery of the Proposed Submission Local Plan were included in Appendix C. Allocations SRN9 or SRN10 are not included in the schedule and no other references were made to the need for these schemes.

The Guildford Council Executive met on 11 May 2016 to review the draft Proposed Submission Local Plan. Appendix C contains a list of infrastructure that the Council considers to be necessary to deliver development contained in the Local Plan. This does not include allocations for new A3 northbound and southbound slip roads at A247 Clandon Road. Allocation SRN9 is for ‘A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme’, a completely unrelated scheme.

The first reference to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road appears in Appendix C of the draft Local Plan considered by the Full Council on 24 May 2016. Although this significant change is not included within the published schedule of changes, the proposed slip roads are included in Appendix C under references SRN10 and SRN11.

The 6 June 2016 consultation version of the Proposed Submission Local Plan includes the proposed slip roads in Appendix C as follows:

SRN9 - A3 northbound on-slip at A247 Clandon Road  SRN10 - A3 southbound off-slip at A247 Clandon Road

Send Parish Council are seriously concerned by the very late allocation of such significant pieces of road infrastructure. It appears that even on 11 May 2016, less than a month before the document was published for consultation, the proposed slip roads were not considered to be necessary to support the proposed site allocations. It appears that allocations SRN9 and SRN10 were added in response to the very late change of allocation A43 in Send and have not been given proper consideration.
Send Parish Council object in the strongest possible terms to allocations SRN9 and SRN10. Paragraph 182 of the NPPF explicitly states that in order for a plan to be considered sound, it must be ‘the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence’. It is clear from the chronology of the allocations set out above that these allocations have been added to the plan at the latest possible opportunity and at the final round of consultation. In order for the plan to be positively prepared, allocations of this scale should have been considered and made available for public comment far earlier in the consultation process. The following paragraphs set out how the supporting evidence base does not demonstrate how these proposed allocations have been carefully considered as part of an appropriate strategy based on proportionate evidence.

Evidence Base

The June 2016 Proposed Submission Local Plan is supported by three key documents setting out the transport evidence base. These are:

1. June 2016 Guildford Borough Transport Strategy
2. June 2016 Topic Paper - Transport
3. June 2016 Strategic Highways Assessment

The June 2016 Guildford Borough Transport Strategy sets out transport proposals to be delivered in accordance with the needs of transport providers, funders and the Council’s own transport evidence base. Proposals SRN9 and SRN10 are included as ‘anticipated improvements’ on page 10 and the indicative programme on page 22. No additional background to these schemes is provided.

The June 2016 Transport Topic Paper sets how the transport strategy was developed. SRN9 and SRN10 are included in a list of transport schemes at Appendix 3. In reference to SRN9 and SRN10 Paragraph 5.52 states ‘these junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange’. No additional background information is provided.

The June 2016 Strategic Highways Assessment is a strategic transport modelling study that informs decision making surrounding the suitability of potential development sites and future highway mitigation proposals which have been identified. Appendix A sets out the strategic residential sites assessed as part of the highways assessment. The main residential site in Send is as follows:

Ref. 2258 - Land south east of London Road Land south east of London Road, Send (part of B13-d) (known as Burnt Common)? 260 homes and 140 flats.

It is unclear which site this refers to. Site 2258 appears to be a reference to the Feb 2016 LAA site reference for the ‘Land at Garlick’s Arch’, however the site description appears to refer to the Land around Burnt Common Warehouse, formerly allocated as Site A43. The B13-d reference appears to relate to the January 2013 Green Belt and Countryside Review area around Burnt Common, not Garlick’s Arch, which falls under land parcel B14 in this document. This shows a high degree of inconsistency in the appraisal and it is unclear which site is even appraised. It is possible that this was changed shortly before the Local Plan was released for consultation with the updated A43 and A43a allocations in May 2016, but it indicates that this piece of evidence is inconsistent and should be ascribed little weight.

In addition to these three evidence base documents, the June 2016 Draft Infrastructure Delivery Plan provides detail on the infrastructure needed to support development included in the Proposed Submission Local Plan 2016. This document includes a repeat of the Infrastructure Schedule included in Appendix 2 of the June 2016 Proposed Submission Local Plan but provides no additional assessment of the justification or potential impact of proposals SRN9 and SRN10.

Overall there is very little evidence available to the public explaining why the new A3 northbound and southbound slip roads at A247 Clandon Road are necessary or justified. It is suggested that SRN9 and SRN10 are necessary in order to mitigate traffic flows from allocation A35 at Wisley Airfield, however it is not at all clear why a development 4km to the north east of Send with an existing junction to the A3 from Portsmouth Road and the B2039 directly to the west of the site requires a new junction at Send. Wisley Airfield was considered for allocation in the October 2013 Issues and
Options Local Plan and allocated in the July 2014 Draft Local Plan for 2,100 homes. New slip roads at Send were not considered to be necessary to support this allocation in July 2014 and the allocation for Wisley Airfield is for an identical number of homes in the June 2016 Proposed Submission Local Plan. It is therefore clear that allocations SRN9 and SRN10 are not required to support allocation A35 at Wisley Airfield.

Until the most recent versions of the Proposed Submission Local Plan, allocation A43 Land around Burnt Common Warehouse, was allocated for up to 7,000 sqm of B1c/B2/B8 employment uses. This allocation was not considered to require a new junction to the A3 despite being allocated for an identical level of employment provision as Garlick’s Arch. Policy E1 of the June 2016 Proposed Submission Local Plan states that when developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common, will be treated as a Strategic Employment Site (allocation A43). The Parish notes that in the draft of the Proposed Submission Local Plan, reviewed by the Council’s Executive Committee on 11 May 2016, Policy E2 states that the new employment site at Burnt Common will be treated as a Strategic Employment Site. The Council has therefore recognised that both sites could be considered to be Strategic Employment Sites and that the Burnt Common Warehouse Strategic Employment Site allocation would not require a new junction to be considered acceptable. This adds further weight to the argument that the new junction works are not necessary and have not been carefully considered.

The chronology of site allocations appears to indicate that allocations SRN9 and SRN10 have been added at the same time as the A43 and A43a allocations in May 2016. We have set out in the following section why Allocation A43 and A43a are unsound and wholly unjustified, but independently of this Send Parish Council object to the proposed new A3 / A247 slip roads ref. SRN9 and SRN10 on the grounds that there is no indication that they have been justified by the evidence available and that the allocations are unsound on the basis that they have not been positively prepared and are not based upon a strategy which seeks to meet objectively assessed development and infrastructure requirements.

Proposed Changes to Make the Local Plan Sound

Remove allocations SRN9 and SRN10.

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

Attached documents:

Comment ID: PSLPA16/4247  Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Strategic Road Network Infrastructure Allocations SRN9 and SRN10

Background

Send Parish Council object to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road, to be delivered on the land covered by allocation A43a. A review of previous iterations of the Local Plan and the associated evidence base shows that these draft allocations have been made very recently and have not been properly appraised.

The July 2013 Infrastructure Baseline study considered the quality and capacity of the existing infrastructure in the Borough and was used to inform the more detailed infrastructure and transport strategies developed throughout the Local Plan process. Chapter 2 of this document identified the A3 as the key Strategic Road Network (SRN) in the Borough and recognised that the form and standard of the A3 through the borough was deficient in quality and capacity, resulting in congestion and unreliable journey times. This baseline has been used to influence the allocation of sites and how infrastructure could be upgraded.

Local Plan Transport Infrastructure Allocations
The various iterations of the draft Local Plan from October 2013 through to June 2016 set out the following approaches to transport infrastructure in the Borough.

The October 2013 Issues and Options Local Plan recognises the need to balance development with traffic congestion and minimise the impact of traffic on local communities. The document also recognises the need to focus new development that will generate significant movement in locations where the need to travel will be minimised and the use of sustainable transport modes can be maximised. This document does not set out specific allocations for transport infrastructure.

The July 2014 Draft Local Plan contained more detailed policy relating to transport and infrastructure. Policy 17 states that the key infrastructure needed to support plan delivery is provided in the infrastructure schedule at Appendix B. This schedule makes no reference to any requirement for a new junction at the A247. This version of the Local Plan allocates 431 homes in Send and Send Marsh / Burnt Common.

The Guildford Borough, Economy and Executive Advisory Board met on 13 April 2016 to discuss the draft version of the Proposed Submission Local Plan. The supporting briefing note states that delivery of the development contained within the Proposed Submission Local Plan is dependent on the delivery of the necessary infrastructure. The infrastructure schemes that the Council considered to be necessary for the delivery of the Proposed Submission Local Plan were included in Appendix C. Allocations SRN9 or SRN10 are not included in the schedule and no other references were made to the need for these schemes.

The Guildford Council Executive met on 11 May 2016 to review the draft Proposed Submission Local Plan. Appendix C contains a list of infrastructure that the Council considers to be necessary to deliver development contained in the Local Plan. This does not include allocations for new A3 northbound and southbound slip roads at A247 Clandon Road. Allocation SRN9 is for ‘A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme’, a completely unrelated scheme.

The first reference to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road appears in Appendix C of the draft Local Plan considered by the Full Council on 24 May 2016. Although this significant change is not included within the published schedule of changes, the proposed slip roads are included in Appendix C under references SRN10 and SRN11.

The 6 June 2016 consultation version of the Proposed Submission Local Plan includes the proposed slip roads in Appendix C as follows:

SRN9 - A3 northbound on-slip at A247 Clandon Road
SRN10 - A3 southbound off-slip at A247 Clandon Road

Send Parish Council are seriously concerned by the very late allocation of such significant pieces of road infrastructure. It appears that even on 11 May 2016, less than a month before the document was published for consultation, the proposed slip roads were not considered to be necessary to support the proposed site allocations. It appears that allocations SRN9 and SRN10 were added in response to the very late change of allocation A43 in Send and have not been given proper consideration.

Send Parish Council object in the strongest possible terms to allocations SRN9 and SRN10. Paragraph 182 of the NPPF explicitly states that in order for a plan to be considered sound, it must be ‘the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence’. It is clear from the chronology of the allocations set out above that these allocations have been added to the plan at the latest possible opportunity and at the final round of consultation. In order for the plan to be positively prepared, allocations of this scale should have been considered and made available for public comment far earlier in the consultation process. The following paragraphs set out how the supporting evidence base does not demonstrate how these proposed allocations have been carefully considered as part of an appropriate strategy based on proportionate evidence.

**Evidence Base**
The June 2016 Proposed Submission Local Plan is supported by three key documents setting out the transport evidence base. These are:

1. June 2016 Guildford Borough Transport Strategy
2. June 2016 Topic Paper - Transport
3. June 2016 Strategic Highways Assessment

The June 2016 Guildford Borough Transport Strategy sets out transport proposals to be delivered in accordance with the needs of transport providers, funders and the Council’s own transport evidence base. Proposals SRN9 and SRN10 are included as ‘anticipated improvements’ on page 10 and the indicative programme on page 22. No additional background to these schemes is provided.

The June 2016 Transport Topic Paper sets how the transport strategy was developed. SRN9 and SRN10 are included in a list of transport schemes at Appendix 3. In reference to SRN9 and SRN10 Paragraph 5.52 states ‘these junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange’. No additional background information is provided.

The June 2016 Strategic Highways Assessment is a strategic transport modelling study that informs decision making surrounding the suitability of potential development sites and future highway mitigation proposals which have been identified. Appendix A sets out the strategic residential sites assessed as part of the highways assessment. The main residential site in Send is as follows:

Ref. 2258 - Land south east of London Road Land south east of London Road, Send (part of B13-d) (known as Burnt Common)? 260 homes and 140 flats.

It is unclear which site this refers to. Site 2258 appears to be a reference to the Feb 2016 LAA site reference for the ‘Land at Garlick’s Arch’, however the site description appears to refer to the Land around Burnt Common Warehouse, formerly allocated as Site A43. The B13-d reference appears to relate to the January 2013 Green Belt and Countryside Review area around Burnt Common, not Garlick’s Arch, which falls under land parcel B14 in this document. This shows a high degree of inconsistency in the appraisal and it is unclear which site is even appraised. It is possible that this was changed shortly before the Local Plan was released for consultation with the updated A43 and A43a allocations in May 2016, but it indicates that this piece of evidence is inconsistent and should be ascribed little weight.

In addition to these three evidence base documents, the June 2016 Draft Infrastructure Delivery Plan provides detail on the infrastructure needed to support development included in the Proposed Submission Local Plan 2016. This document includes a repeat of the Infrastructure Schedule included in Appendix 2 of the June 2016 Proposed Submission Local Plan but provides no additional assessment of the justification or potential impact of proposals SRN9 and SRN10.

Overall there is very little evidence available to the public explaining why the new A3 northbound and southbound slip roads at A247 Clandon Road are necessary or justified. It is suggested that SRN9 and SRN10 are necessary in order to mitigate traffic flows from allocation A35 at Wisley Airfield, however it is not at all clear why a development 4km to the north east of Send with an existing junction to the A3 from Portsmouth Road and the B2039 directly to the west of the site requires a new junction at Send. Wisley Airfield was considered for allocation in the October 2013 Issues and Options Local Plan and allocated in the July 2014 Draft Local Plan for 2,100 homes. New slip roads at Send were not considered to be necessary to support this allocation in July 2014 and the allocation for Wisley Airfield is for an identical number of homes in the June 2016 Proposed Submission Local Plan. It is therefore clear that allocations SRN9 and SRN10 are not required to support allocation A35 at Wisley Airfield.

Until the most recent versions of the Proposed Submission Local Plan, allocation A43 Land around Burnt Common Warehouse, was allocated for up to 7,000 sqm of B1c/B2/B8 employment uses. This allocation was not considered to require a new junction to the A3 despite being allocated for an identical level of employment provision as Garlick’s Arch. Policy E1 of the June 2016 Proposed Submission Local Plan states that when developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common, will be treated as a Strategic Employment Site (allocation A43). The Parish notes that in the draft of the Proposed Submission Local Plan, reviewed by the Council’s Executive Committee on 11
May 2016, Policy E2 states that the new employment site at Burnt Common will be treated as a Strategic Employment Site. The Council has therefore recognised that both sites could be considered to be Strategic Employment Sites and that the Burnt Common Warehouse Strategic Employment Site allocation would not require a new junction to be considered acceptable. This adds further weight to the argument that the new junction works are not necessary and have not been carefully considered.

The chronology of site allocations appears to indicate that allocations SRN9 and SRN10 have been added at the same time as the A43 and A43a allocations in May 2016. We have set out in the following section why Allocation A43 and A43a are unsound and wholly unjustified, but independently of this Send Parish Council object to the proposed new A3 / A247 slip roads ref. SRN9 and SRN10 on the grounds that there is no indication that they have been justified by the evidence available and that the allocations are unsound on the basis that they have not been positively prepared and are not based upon a strategy which seeks to meet objectively assessed development and infrastructure requirements.

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

Attached documents:

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Comment ID: PSLPA16/4231  Respondent: 15674689 / Chris Baker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed Infrastructure Schedule (Appendix C). There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

I object to the infrastructure schedule because of the lack of accurate and unverifiable costs of the proposed infrastructure improvements. It is not clear or guaranteed that developers will commit to the costs required.

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

Attached documents:

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Comment ID: PSLPA16/4276  Respondent: 15687201 / Mandy Cox  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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: pslp173/490</th>
<th>Respondent: 15689953 / Environment Agency (Oliver Rathmill)</th>
<th>Agent:</th>
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2.4 Appendix C Infrastructure Schedule

We note that your WQA is mentioned on page 345. It is suggested the purpose of this document is just to assess waste water infrastructure. This is only one half of the assessment. The other is considering the environmental capacity of the effluent receiving waters. This environmental capacity consideration has been included as part of the assessment that AECOM has undertaken on behalf of the council. For the sake of accuracy and clarity we recommend that this is updated to include this aspect of the WQA.

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

**Attached documents:**

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<th>Comment ID: PSLPA16/4373</th>
<th>Respondent: 15704737 / Sarah Smith</th>
<th>Agent:</th>
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There are multiple developments proposed in the Merrow and Burpham area. The road infrastructure cannot cope currently - these developments in the area will cause terrible issues. Any new development or changes MUST be pre-dated by new infrastructure. It is no good if the road changes are made after developments and changes are made.

The sustainable movement corridor seems to be a huge cost with little benefit. I would suggest that this is very carefully reviewed for cost effectiveness. It would certainly have zero benefit for those of us living in Merrow and would cost a huge amount of our funds.

**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: PSLPA16/4554</th>
<th>Respondent: 15705537 / G-Bug – The Guildford Cycling Campaign (Doug Clare)</th>
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**Appendix C**

**AM Active Modes**

Infrastructure Projects AM1 Guildford Wayfinding Signage System and AM2 Comprehensive Guildford Borough Cycle network are listed for completion between 2016 and 2033. This must be brought forward for completion within 10 years and funding found to ensure this happens. The return on investment will be repaid tenfold.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to the fact that the Local plan does not effectively demonstrate proposals to improve road networks to accommodate the additional vehicles likely to travel through East and West Horsley. The majority of through roads are narrow, have pinch points and are subject to closure through flooding on a regular basis.

1. LRN7 intends to introduce interventions to address potential highway performance issues resulting from the development of Wisley airfield. If these are those put forward by the developers they are likely to have a significant negative impact on East and West Horsley, or any traffic travelling to or through even without additional housing.

2. LRN22 East and West Horsley traffic management and environmental improvement scheme is non specific and the suggested £1m is insufficient to make sufficient improvements to deal with the substantial traffic increase likely if all aspects of the local plan are allowed.

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

I live in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] which borders the proposed path on its West side. I completely concur with Mr Jenkins view and would also add:

1. the proposed path will have a significant negative impact on the security and privacy of both [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. I have a young family and therefore object strongly to it
2. the proposed path will open up the southern boundary of our property (approximately 200m wide) which will also require new fencing and screening which will obviously increase the costs already mentioned by Mr Jenkins.

I am also happy to attend meetings to discuss this topic further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPA16/4477</th>
<th>Respondent: 15717217 / Ian Ferguson</th>
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<td>A decision is needed on a tunnel before Gosden Hill can be earmarked for development.</td>
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<th>Comment ID: PSLPA16/4506</th>
<th>Respondent: 15724673 / Matthew Bell</th>
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<th>Respondent: 15724801 / Talei Fawcett</th>
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I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

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

Attached documents:

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Comment ID: PSLPA16/4516  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

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Comment ID: pslp173/369  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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

The earliest dates for the railway stations at Park Barn and Merrow are not expected before 2024 (six years later than first anticipated).

Two road safety schemes for the A3 have been abandoned.

SCC appear to have washed their hands of involvement in the delivery of a number of highway developments on the local road network (which is their responsibility). (E.g. those in LRN7).

LRN7 (For Wisley Airfield) is an example of inadequate infrastructure requirements to address the problems that would be created by a strategic site.

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

Attached documents:

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Comment ID: pslp173/2  Respondent: 17070913 / Green Reach Limited (Matthew Estwick)  Agent: Obsidian Strategic (Philip Scott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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Section page number  Document page number
Page 271 of 278  285
We approve of the changes to the wording for SANG8 Land Adjacent to Long Reach, West Horsley. This SANG should be retained in the PSLP. SANG8 is a strategic SANG proposal which is supported by Natural England and it will deliver significant net benefits towards habitat creation and biodiversity. The HRA supporting the PSLP makes it clear that the proposed housing strategy can only be delivered if the identified SANGS are brought forward in those locations proposed in the PSLP.

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

Attached documents:
I am writing to you to object to parts of the local plan in Guildford. Firstly, I live on [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I have noted that the SRN6 "Beechcroft Drive safety scheme" has been removed from the local plan.

Having spoken to the highways agency they have requested this be removed, as they will "not be able to fulfil the request in time of the local plan". The local plan is something like 10 years, so I don’t understand why this has been removed, especially as a recent study carried out by the highways agent recommended that the Beechcroft drive access be closed and a suitable and safe alternative be found.

We have older residents living on the road who cannot leave via car now, and we think that the A3 has become so busy now it is only a matter of time before a fatal accident.

If Beechcroft Drive is not made safe, there is no way the A3 can be widened as we will not be able to cross safely into our road, and if the A3 is not widened then how will Guildford cope with the extra traffic of a huge housing development?

The university promised in 2003 to make the land of Blackwell farm publicly accessible as a communal area, they have gone back on their word and are putting profits in front of the needs of local people and wildlife.

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

Attached documents:
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: pslp173/273  Respondent: 17303713 / Andrew Fitchie  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: pslp173/334  Respondent: 17323265 / Simon Owen  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

Comment ID: pslp173/336  Respondent: 17323585 / Jane E Foxon  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

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

Attached documents:

| Comment ID: pslp173/404 | 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 / Appendix C: Infrastructure Schedule |

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

The following representations are made in respect of the Infrastructure Delivery Plan:

1. Transport - Local Road Network
   - LRN14 A331 Blackwater Valley Route
     The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.

     It is welcomed that the GBC Transport Strategy 2017 identifies that Improvements to the Junction of the A331 Blackwater Valley Route with the A31 Hogs Back (LRN14) have been secured as part of a provisional allocation of £12.5 million from the Enterprise M3 Local Enterprise Partnership.

   - LRN15 The Street (Tongham) Environmental Improvement Scheme
     The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.

     However, it is considered, given that impacts in this location are already evident and in the future, are related to strategic growth, the funding source should, for consistency with other infrastructure projects included in the IDP make an allowance for some funding to come via the Local Growth Fund.

     Support is given for the updated change in delivery timeframe to between 2018-2026

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<tr>
<th>LRN15</th>
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   - LRN16 A31 Hog’s Back (Tongham to Puttenham)
     The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.

     However, in our opinion given that impacts in this location are already evident and in the future, are related to strategic growth, the funding source should, for consistency with other infrastructure projects included in the IDP make an allowance for some funding to come via the Local Growth Fund.
The change from Developer Contributions to Developer Funded for consistency through the IDP is noted. While no justification has been provided as to the need for a new bridge crossing, should GBC pursue this aspiration, it is evident that the additional pressure on this crossing is likely to come about as a result of increased movements on the North Downs Line, and strategic road / junction closures and as such the identified mitigation is not solely development related. Therefore, in our opinion for consistency with other strategically driven infrastructure schemes included in the IDP, the wording should be amended to allow for some funding to come via the Local Growth Fund.

3. Green Infrastructure - SANG

Manor Farm, Tongham forms part of the Strategic Site Allocation A29. As part of the current planning application / appeal, bespoke SANG at Tongham Road, Runfold is to be brought forward. Objection is made to the omission of this bespoke SANG from the list of proposed SANG at Appendix C of the Plan. The proposed SANG should therefore be incorporated as new SANG13 as set out below:

<table>
<thead>
<tr>
<th>New SANG13</th>
<th>Bespoke Suitable Alternative Natural Green Space (SANG) Tongham Road, Runfold</th>
<th>Years 1-5</th>
<th>Developer</th>
<th>Developer funded</th>
</tr>
</thead>
</table>

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

The following representations are made in respect of the Infrastructure Delivery Plan:

1. Transport - Local Road Network

   • LRN14 A331 Blackwater Valley Route

   The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.

   It is welcomed that the GBC Transport Strategy 2017 identifies that Improvements to the Junction of the A331 Blackwater Valley Route with the A31 Hogs Back (LRN14) have been secured as part of a provisional allocation of £12.5 million from the Enterprise M3 Local Enterprise Partnership.

   • LRN15 The Street (Tongham) Environmental Improvement Scheme

   The change from Developer Contributions to Developer Funded for consistency through the IDP is noted.

   However, it is considered, given that impacts in this location are already evident and in the future, are related to strategic growth, the funding source should, for consistency with other infrastructure projects included in the IDP make an allowance for some funding to come via the Local Growth Fund.

   Support is given for the updated change in delivery timeframe to between 2018-2026

LRN15
The Street (Tongham) environmental improvement scheme
Between 2017-2018 and 2026
Surrey CC
£0.5m Developer Contributions / Local Growth Fund

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

Attached documents:

Comment ID: pslp173/407  Respondent: 17976417 / Thakeham Homes (Sir or Madam)  Agent: Vail Williams LLP (J Lacey)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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

Transport - Local Road Network

5.1 LRN22 East Horsley and West Horsley traffic management and environmental improvement scheme.

5.2 Support is given to the infrastructure improvement, however we Object to the timeframe if this leads to a delay in the delivery of much needed housing on sites such as A38 that could be delivered early in the local plan process as a result of waiting for the ‘…£1m Developer Funds’ as per the changed text.

Green Infrastructure - SANG

5.3 Manor Farm, Horsley, policy A38 includes a bespoke SANG (as outlined in requirement (4) of the policy) – SANG9 (Bespoke Suitable Alternative Natural Green Space (SANG) Bens Wood, West Horsley. We SUPPORT the SANG provision and it being ‘Developer Funded’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp173/785  Respondent: 18148609 / Office of Rail and Road (Paul Wilkinson)  Agent:

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

We have noted that the Council has identified costs but have you received confirmation for funding for these schemes?

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

Attached documents:

Total records: 740.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Appendix D - Evidence Base
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPA 16/2808  Respondent: Alan Cook Consultancy (Alan Cook)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The land availability assessment and strategic housing market assessment have not picked up on all available sites and require further work. Consequently, policies H1-H3 require further work and are not based on up to date analysis of available sites.

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

Attached documents:

Comment ID: PSLPA 16/3028  Respondent: Transport for London (Richard Carr)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

TfL is working to implement the recommendations of the National Infrastructure Commission relating to the delivery of growth associated with Crossrail 2. From a strategic transport perspective, Crossrail 2 would release capacity on rail corridors that are used by trains to/from Guildford and thereby help to support future development within the borough, although Crossrail 2 would not directly serve any stations within Guildford. Explicit support for Crossrail 2 and a recognition of its important contribution to delivering future growth as set out in the Local Plan would be welcomed.

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

Attached documents:

Comment ID: PSLPA16/409  Respondent: 8553761 / A Howlett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. A better alternative would be to blocks of build bed sits in Guildford for single occupancy to house the thousands of immigrants seeking work in the UK.

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

Attached documents:

Comment ID: pslp173/725  Respondent: 8555233 / Safeguard Coaches Ltd (Mr A J Halliday)  Agent:

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

Consultation on the Amended Local Plan: Provision for Bus-based Public Transport

As well as (or as part of?) its consultation on the proposed Amended Local Plan, Guildford Borough Council is also consulting on the future of Guildford’s Friary Bus Station and alternative options as part of its plans to regenerate the ‘North Street Quarter’.

As a significant commercial bus operator in the Guildford area carrying in excess of 850,000 passengers per annum I write to explain our position concerning the options tabled by SYSTRA on behalf of Guildford Borough Council in March 2017 (report released 28 June 2017). This is highly relevant to the Local Plan.

Unleashing the Potential for Bus-based Public Transport in Guildford

With an estimated 7.5 million bus journeys[1] already being made annually in Guildford we believe that bus-based public transport has a vital role in supporting Guildford’s economy, addressing traffic congestion[2] and improving air quality, particularly in the Town Centre, and therefore that generous provision should be made for it, particularly within the heart of the Town.

This will be even more critical if further development of Guildford, as suggested in the draft Amended Local Plan, is to proceed without causing significantly greater amounts of traffic congestion and worsening air quality.

Bus networks are very flexible and responsive and consequently lead times for improvements can be fairly short. In contrast to other modes, investment in bus services is generally not expensive – and is capable of delivering relatively quick returns.

However, to be commercially viable and appealing to existing customers and current non-users alike, bus-based public transport must be more convenient than using the car.

Crucially this means that buses must be able to use direct, quick and efficient routes into and around the Town Centre and be able to drop off and pick up customers very close to where they want to get to. The vast majority of passengers wish to access the heart of the Town Centre which is why the location of current bus station is so appreciated.

These views are absolutely consistent with the tenor of ARUP’s Technical Note on Existing Conditions Commissioned by GBC and SCC dated 27 May 2016, the Guildford Town Centre and Hinterland Masterplan Report by Allies and Morrison (October 2015) and comments by Councillor Paul Spooner (as Leader of the Council), former Managing Director Sue Sturgeon and Councillor Matt Furniss[3]. The fact that, at 7.4%, Guildford already has a higher bus mode share than the national average (5%) suggests that there is already a solid (if small) base to build on.

Guildford cannot continue to grow and compete with other retail and employment centres without providing more sustainable and attractive means of accessing and moving around its Town Centre. Attractive-to-use bus-based public transport will, of necessity, play a key role in facilitating this as there is very limited scope to increase other modal provision in the short to medium term.

In summary, we believe that buses should be seen as the solution and not the problem and we would encourage you to think similarly.

Critique of the Options Tabled by SYSTRA on behalf of GBC

Neither SYSTRA’s Primary Option (relocation of stops to Leapale Road/North Street with some additional layover at Bedford Wharf) or the Secondary Option (relocation of stops to Leapale Road/North Street and provision of layover at Bedford Wharf along with some bus departure bays) will allow buses to fulfill their true potential. SYSTRA’s report on the stakeholder engagement exercise makes this quite clear. Consequently, we cannot support either Option as they stand.
Specifically, both Options would result in buses serving points South, West and North of Town (services in the latter two directions being the most frequent and heavily used) not being able to drop off and pick up customers and workers close to where they want to get to without significantly increased journey times which will reduce the appeal of the bus service to existing and potential bus users and increase operating costs. *Terminating services at Bedford Wharf without first accessing the heart of the Town Centre is not an acceptable alternative.*

Rather than facilitate the exciting vision outlined above, we believe that the resulting extended bus service routings will deter large numbers of existing and potential users from using the bus as their mode of travel to the Town Centre because a key selling point – that of convenient access to the heart of the Town – will be seriously eroded for the majority of passengers. Reduced bus use, together with increased operating costs, will result in higher fares and/or reduced frequency of service (impacting disproportionally on the more marginalized in society who are more dependent on bus services to access jobs and other facilities) and/or increase the call on scarce public funds through a greater need for bus service support.

We therefore consider that there is a real danger that the Options - as currently drafted – could cause bus transport to become marginalized and increasingly a mode of necessity rather than one of choice, reversing current positive patronage trends.

Failure to embrace the opportunity – already being taken by many towns and cities across the UK[4] – to harness the potential of buses to support sustainable economic growth in Guildford and its environs would be a huge opportunity missed to help address Guildford’s chronic traffic congestion and poor air quality[5]. This is because provision of excellent public transport as a viable and attractive alternative to the car would allow a greater degree of restraint on car use to be considered politically, socially and economically acceptable, thereby helping to achieve the modal shift which is so often talked about when considering how to release Guildford’s town centre from the ‘vice-like grip’ of unfettered traffic volumes and congestion and make it a more attractive place to live, work, shop and relax.

**What We Propose**

Our natural preference would be the re-provision of a modern state-of-the-art central Bus Station as part of the North Street Quarter development, for example at the south end of a widened Leapale Road with excellent bus and passenger access via Leapale Road and the whole length of North Street.

However, we are not entirely dismissive of the concept of the relocation of stops to Leapale Road/North Street and provision of additional layover at Bedford Wharf along with some bus departure bays (effectively a hybrid of SYSTRA’s Primary and Secondary Options) but, **crucially, to make this work we additionally require that:**

- **bus access to, and customer facilities in, the whole length of North Street is provided** in order that:
  1. buses serving the South, West and North of Town and beyond can follow a direct, quick and efficient route into and around the Town Centre viz North Street, Leapale Road, Onslow Street;
  2. there is sufficient opportunity for buses to drop off/pick up customers in the heart of the Town Centre and have adequate opportunity for recovery time between journeys to ensure service reliability **without buses on high frequency routes having to travel to the proposed Bedford Wharf bus layover facility** as this would not be operationally or commercially viable;

- **all other through vehicular traffic is removed from the whole of North Street and Leapale Road** so that these roads become more pleasant environments for pedestrians, create space for buses and other sustainable modes and assist bus network reliability.

It is vital to appreciate that a central bus station and/or allowing buses to access the whole of North Street will not **undermine the viability of the proposed redevelopment of the North Street Quarter**. Rather it will **enhance** its viability (and that of the Town Centre as a whole) by allowing buses to bring large numbers of customers and workers close to these places and play an increasing part in resolving the chronic traffic congestion (and consequent unpleasantness evidenced by poor safety, air quality, pedestrian connectivity and visual intrusion) which is currently blighting the Town Centre, thereby making Guildford an increasingly desirable place to live, work, shop and relax.
In order to help create an attractive and sustainable Town Centre which is not blighted by traffic we also believe that:

- Bridge Street should be dedicated solely to buses, pedestrians and cycles (plus very limited vehicular access to premises) travelling in both directions following removal of the Gyratory system in order to speed up bus journeys (both in actual terms and vis-a-vis the car), allow better bus/rail interchange close to the main entrance of Guildford Railway Station and making Bridge Street a more pleasant and safer environment for pedestrians and cyclists;

- car parking provision should largely be located just outside the central core of the Town (eg Millbrook, Bedford Road[6], Guildford Park Road etc), as opposed to right in the centre (eg on-street in North Street, Leapale Road multi-storey car park, Portsmouth Road surface car park[7]. Much more emphasis should be placed on directing motorists, especially long stay and contract permit holders, to the Town’s Park & Ride facilities[8], all of which have spare capacity. This would help to remove traffic from the central core which would reduce congestion and visual intrusion, increase space for sustainable transport modes, improve safety and air quality and allow more public spaces and living streetscapes to be created;

- vehicular deliveries to Town Centre premises must be strictly limited to those times which do not interfere with peak travel demand or retail activity;

- provide additional road infrastructure, in particular an additional river/road crossing, to relieve the Town Centre and the existing Gyratory area and resolve the propensity of the A3 bottleneck to cause widespread congestion throughout the Town[9].

**Bus Routings**

Allowing buses to access the whole of North Street (as opposed to just the part east of Leapale Road) is essential to provide direct, quick and efficient bus services into and around the Town Centre for customers arriving from/departing to all points of the compass.

Inability to access (lower) North Street would result in buses (hence passengers) having to undertake a significant detour, presumably via York Road and (narrow) Chertsey Street to reach (upper) North Street and Leapale Road. This would add significantly to journey times and operational costs and reduce customer appeal.

A ‘sustainable modes only’ Bridge Street could also be served by buses using the proposed Sustainable Movement Corridor (SMC).

We have drafted provisional bus routings and recommendations for bus passenger infrastructure which we would be happy to discuss with you.

**Reciprocal Commitments from Bus Operators**

In exchange for excellent access into the heart of a relatively traffic-free Town Centre and provision of high quality bus stands as described above Safeguard Coaches would be pleased to discuss:

- an Enhanced Partnership arrangement (as provided for in the new Bus Services Act) between themselves, Guildford BC, Surrey CC and other stakeholders to promote bus-based public transport, achieve high standards of bus service reliability and coordinate initiatives (including common ticket products for the Guildford area);

- minimum bus service levels, including during evenings and Sundays/Public Holidays;

- even more attractive fares for young people and maximum adult/child fares according to distance travelled, M-ticket and contactless payment options;

- improved customer WiFi on all buses;

- minimum environmental standards of vehicles used in shared spaces (primarily Bridge Street, North Street and Leapale Road) by specified dates; and
excellent staff training/management/control of driver behaviour when navigating shared spaces.

Summary

Safeguard Coaches absolutely believe buses have a central part to play in helping to resolve the issues facing Guildford and in particular its Town Centre and maintains that, without excellent provision for this form of transport, the Council’s vision for an expanding Guildford (as indicated in the proposed Amended Local Plan) will not be realizable.

However, we cannot support either the options which were the focus of SYSTRA’s stakeholder consultation exercise on commercial and operational grounds and have already raised concerns over the impact of the proposals on the ability of Guildford’s bus network to support and enhance Town Centre retail and leisure activity, access to job opportunities, traffic congestion etc.

While our first preference would be a new, high quality bus station of the same size as the current facility built as part of the North Street Quarter, we think that other solutions could work and have developed exciting and workable ideas which have the potential to meet the requirements of both bus passengers and operators, in particular bus facilities in the heart of the Town Centre (where most people want to go) and quick and reliable access to them.

Re-provision of a central bus station and/or allowing bus access the whole of North Street will not undermine the viability of the proposed redevelopment of the North Street Quarter but rather will enhance it by allowing them to bring large numbers of customers and workers directly to it.

Key to success in this regard will be restraint on car use in the Town Centre through:

- implementation of a ‘drive to, not through’ policy for general traffic;
- removal of through vehicular traffic from the central area and restrictions on deliveries;
- relocating car parking to edge-of-centre locations;
- greater use of existing Park & Ride facilities, especially for long stay and contract parking;
- provision of additional road infrastructure to relieve the Town Centre road network.

We urge the Council to be ambitious in its aspirations to create a Town Centre that we and our children can be proud of and believe that, in this context, bus-based public transport will be able to help deliver much needed improvements in terms of connectivity, sustainability, air quality, safety and social inclusion at an affordable price and in a realistic timescale.

Safeguard Coaches urges GBC to engage meaningfully with us and the Town’s other principal bus operators and existing/potential bus passengers in a spirit of true partnership such that the very best solution for Guildford can be found and implemented. For our part, we are prepared to work with other stakeholders to achieve that outcome but will not accept ‘watered down’ versions.

I trust that this letter provides a helpful synopsis of Safeguard Coaches’ position, in particular making quite clear that we cannot support the proposals as currently tabled by SYSTRA but suggesting that there are other really exciting and more sustainable solutions available while offering to work in partnership with Guildford Borough Council and other stakeholders to deliver bus-based public transport that Guildford can be proud of.

**Information provided by Laurie James, Passenger Transport Section, Surrey County Council.**

**Recent research by traffic monitor Inrix has revealed Guildford to be the most congested town in the country, only exceeded in this respect by the cities of London, Manchester, Aberdeen, Birmingham and Edinburgh (Surrey Advertiser, February 2017).**

**Matt Furniss: ‘Improvements to the bus services are key to achieving a modal shift in the town’ (Surrey Advertiser, 24 March 2017), ‘We remain committed to encouraging sustainable, integrated transport and quality passenger facilities’(Surrey Advertiser, March 2017).**

**According to Bus Users UK many towns and cities have seen significant growth in bus passenger numbers through highly-visible bus services that operate in close proximity to the main shopping areas.**
Poor air quality is particularly evident around the Gyratory and its approaches.

Bedford Road car park could be linked to the Town Centre by a new larger and iconic pedestrian bridge across Onslow Street. Millbrook car park could be double-decked.

Save for a small element of premium-priced short stay parking and provision for Blue Badge holders.

Oxford, York and Winchester are great examples of how effective such a strategy can be. Winchester Crown Court will only refund jurors’ Park & Ride fees, not Town Centre car parking fees, thereby positively encouraging jurors not to drive into the centre of the City. We also recommended increase in town centre parking charges. We consider that reduced revenue from car parking will be more than compensated by the many benefits arising from parking policies designed to reduce town centre congestion and land take.

Ideally by a tunnel.

Evidence from other towns (High Street in Exeter, Fleet Street in Torquay, South Street in Worthing and Terminus Road in Eastbourne are good examples) would suggest that allowing bus access to otherwise largely pedestrianized zones can be achieved without compromising safety while enabling a much-improved streetscape.

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

Attached documents:

Comment ID: PSLPA16/1410  Respondent: 8555297 / Mrs G M Aish  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Objection to Guildford Borough Council Proposed Submission Local Plan

I am writing because I strongly object to the new Guildford Local Plan. Little consideration has been paid to your Council Taxpayers’ criticisms of the previous draft Local Plan.

The housing need figure seems to be based on a methodology which is unknown by the public and councillors alike. How can a plan be formed without any knowledge of how the figures were obtained? Surely before spending so much of our Council Tax on consultants and the whole Local Plan process it should have been agreed that the method used to determine the figures would be made available. It should now be reviewed also to reflect the consequences of Brexit; one widely expected consequence is a reduction in the number of overseas students through concern at their ability to continue their studies. I object to the housing need proposals.

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

Attached documents:

Comment ID: PSLPA16/3002  Respondent: 8555745 / Mr Alan Short  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the limited consultation period, especially to the last minute inclusion of new sites with less than 2 weeks notice.

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

Attached documents:

Comment ID: PSLPA16/1537  Respondent: 8557985 / Artington Parish Council (Philip Gorton)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Arlington Parish Council response to the draft Guildford Local Plan with regards to the Strategic Housing Market Assessment (SHMA)

Arlington Parish Council's (APC) comments on the Borough's proposed housing numbers are dealt with separately in this letter from those matters particularly affecting Artington, which are dealt with another letter of today's date.

The draft Plan proposes building 13,800 new homes based on a 25% increase in the Borough's population over the Plan period to 2033, necessitating 693 houses per annum to be built, 70% within the Green Belt. The use of the Green Belt for this purpose would be irreversible.

APC objects to the lack of reliable up-to-date evidence to support the population increase and the pivotally interconnected housing need numbers. Inevitably, by reason of the passage of time, the Strategic Housing Marketing Assessment (SHMA) published in September 2015 has no regard not only for the significant findings of three well researched studies received during the consultation period, but also for Britain's decision to leave the EU following the referendum on 23rd June.

The three studies are those undertaken by GBC Cllr Reeve, Mr Niels Laub and Mr Neil McDonald. GBC will be familiar with these studies, so no useful purpose is served by reciting their findings here other than to note that the 693 houses per annum proposed in the draft Plan is at least 35% greater than the number evidenced by the studies. This material potential overstatement of housing needs is even before taking into account the decision to depart from the EU, expected to have significant economic and immigration consequences, both nationally and locally. These consequences were all unforeseen when the SHMA and draft Plan were published and approved by GBC. They are likely to conspire to reduce the need for new dwellings in the Borough.

While APC is sympathetic to the difficulties and inconvenience involved in revisiting the draft Plan at this stage, normal professional standards require that any important exercise such as the preparation of the draft Plan should be revisited in the light of significant new information and/or subsequent events,

e.g. those which call into question key features of the evidence on which the draft Plan is based. Accordingly, APC considers that the SHMA and the draft Plan should be reviewed by GBC and its advisers to address these important issues before the draft Plan is submitted to HM Inspector.

Concern has repeatedly been expressed by borough councillors that failure to move forward on the basis of the higher number of houses being built may well result in HM Inspector unilaterally imposing an even higher number. Particularly in the exceptional circumstances that have arisen since the preparation of the SHMA and the draft Plan, APC considers it both alarming and wholly unacceptable that this should be regarded as a valid concern or a justification for not revisiting the draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The primary concern of the Planning group is that the method of calculation of the Objective Assessment of Need (OAN) for housing - the SHMA - fails to reassure us of the robustness of the process, and the absence of an ‘open source’ interpretation of population and household formation forecasts cannot be helpful to Guildford Borough Council’s cause.  
75.1. A recent analysis by Neil McDonald shows that there have been several anomalous assertions and conclusions drawn by GL Hearn, that the SHMA is not sound and does not represent a suitable basis for determining the Objective Assessment of Need and, consequently, the housing target in the Local Plan.  
75.2. The Society was already concerned that, within the SHMA, there is little justification for the large additional economic need for homes that have been taken into the OAN number. Neil McDonald has shown that the GL Hearn approach double counted the employment-related housing need.  
75.3. The failure to properly and comprehensively analyse the impact of transient student numbers on the underlying population growth forecasts (not to mention the flaws in the 2011 census treatment of students highlighted in our original response) has led to an incomprehensible report by GL Hearn, promoting irreconcilable numbers with an arrogance that would be breath-taking were it not so potentially damaging to Guildford.  
75.4. The Council should take note of the Neil McDonald report and consider rethinking its Objective Assessment of Need and housing target numbers.  

Policy S2 sets out a phased increase in housing target from 500 to 700 homes per year over the first five years and to 790 homes per year by the end of the plan period. This phasing is predicated on the delivery of infrastructure.  
The Society is concerned that this will not be manageable in practice and development will come forward faster than the associated infrastructure – the infrastructure needing to be provided across the Borough and beyond, and the developers needing to demonstrate a non-severe impact locally.  
The Society notes the potential to have a review process for the Local plan and comments as follows:  
78.1. The proposed Local Plan has a long period, 2013 to 2033, twenty years. The previous 2003 Plan had a period of only three years (to March 2006), though it is till current after thirteen years. Much can change in thirty years, and one would expect the Plan to include cognizance of that.  
78.2. The proposed Local Plan is premised on certain predictions of population and economic growth. Such predictions are always subject to error, and the likelihood of error grows the further the predictions extend into the future. Indeed, the certainty of predictions thirty years ahead must be very low indeed.  
78.3. Because the proposed Local Plan has such a long time scale, one would expect it to include specific review dates or mechanisms. Paragraph 153 of the NPPF states “Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances”. Circumstances are bound to change considerably over thirty years, and may change significantly over much shorter time scales.  
78.4. The only reference in the proposed Local Plan to review is paragraph 1.19 in the chapter on Monitoring Indicators. It says: “We will review the Local Plan, if required, by using the outcomes of the Annual Monitoring Report(s). As part of a review, we will consider the proposed level of new homes and employment land. We will examine all available information and, if necessary, undertake further work to develop our evidence base. Should evidence suggest that we are not meeting our objectively assessed need, various options, including identifying potential new site allocations and requesting assistance from neighbouring authorities, will be considered.” This statement covers any need to make upward adjustments, but makes no reference to any need to make downward adjustments.  
78.5. The most contentious issue in the proposed Local Plan is the housing target, which has been set equal to the
Objectively Assessed Need (OAN). The OAN is taken from the West Surrey Strategic Housing Market Assessment (SHMA), Guildford, Waverley and Woking Borough Councils, Final Report September 2015. The chapter on Monitoring and Review in the Final Report states:

78.5.1. “10.58 Through a proactive monitoring process it will be possible to maintain and develop understanding of the housing market, building on the outcomes of the SHMA. It will allow the implementation of policies to be tailored to evolving circumstances and inform future policy development.

78.5.2. “10.59 Long-term monitoring which addresses indicators of housing need, market signals relating to supply-demand balance, and the housing supply trajectory can inform future development and implementation of planning policies for housing provision.”

78.6. The SHMA therefore foresees a need to review, and makes no presumptions as to what adjustments, upward or downward, may be necessary.

78.7. The Draft Guildford Borough Infrastructure Delivery Plan 2016 is much more positive than the proposed Local Plan as regards review. It states:

78.7.1. “1.2. This draft IDP will be subject to change up to and potentially during the Independent examination of the draft Local Plan. The IDP Infrastructure Schedule is a ‘living document’ that will be reviewed and modified as required throughout the plan period as further information becomes available in order to ensure that it remains up to date.”

78.8. As noted above, the Society’s judgement is that the OAN predictions are fragile and too high. They depend greatly on predictions of population growth, and much of this is ascribed net international immigration. In the present political climate predictions of immigration must be subject to much uncertainty.

78.9. We judge that the proposed Local Plan should include an explicit commitment to review its key targets, especially the housing target, every five years, say. This commitment should use positive wording and should cover all eventualities be they upward or downward.

78.10. At the very least, the wording of paragraph 1.19 should be amended to take this properly and fully into account.

The Reg19 Consultation plan would be more effective if there were more focus on types of housing and allocations—these may come forward in the technical part of the plan in due course but we remain to be convinced that the plan will deliver the types of homes we need.

The Society, fresh from the Solum application where a development of 438 apartments was supposedly not capable of meeting viability tests with more than 10% affordable housing, is concerned to understand how the Council will achieve (and retain) the desired 40% affordable housing. We would like to see stronger words to ensure that legal agreements can secure the amount of affordable (including social) housing in the long term.

We are concerned that imported demand from, say, London could take up as many homes as we can provide and, to the extent possible, we would like to see some priority to provide homes for local residents (especially affordable housing) before new demand is catered for.

Policies should encourage quality town centre housing for local down-sizers to enable the market to be effective and efficient.

We are keen to avoid the insidious pressure where town urban area developments seem to apply a density factor governed solely by the desire to maximise numbers of dwellings.

The Society remains to be convinced that the evidence is strong enough to justify greater retail development at the expense of other town centre uses. The caveat applied by Carter Jonas in their report as part of the Evidence Base is hardly emphatic.

85. Notwithstanding the Town Centre will be the subject of further master planning, the relocation of non-retail uses may free up sites for town centre housing.

86. We note reports of a recent increase in interest in town centre locations from large employers in office accommodation.
The Society recognises that a major barrier to large employers is the toxic combination of traffic congestion and a shortage of housing that is affordable for key workers.

87. The Guildford Society has great concern about last paragraph of the Vision statement – ‘Delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford’. This implies that early approval of large schemes will not require improvement to A3. Also concern about the letout clause in each of the four strategic site allocations: ‘...or otherwise alternative interventions which provide comparable mitigation’. We find it difficult to understand how this will work in practice.

88. There is also general concern that without very strong wording in the plan developers will find defensible excuses for not providing infrastructure, especially given the urgency of meeting housing targets. The Plan’s wording and drafting needs to be carefully checked and we fear it could be exploited. Much of it is somewhat too non-committal, and there are many places where we need to see “Require” in place of “expect”.

89. The Guildford Society also has continuing concerns about cumulative impact. How will the Borough decide when the limit has been reached with respect to particular constraints and, therefore, at what points lack of major infrastructure investment will prevent approval of schemes?

90. We are concerned to ensure the Council has a strong capability (in policies and supporting skills) to contest developer claims that they are unable to deliver 40% affordable housing on the grounds of viability.

91. The Guildford Society is concerned to ensure that individual site allocations should refer to the need for sympathetic development to preserve local character—particularly because the qualitative part of the Local Plan (Development Management Policies) is lagging some distance behind this Site Allocations Local Plan. We would have preferred to have at least some idea of the likely detailed policy environment in which development of many of these sites will be brought forward. By way of an example, compare 2003 Policy HE4 on Listed Buildings, which has no let-out clauses, with the let-out in the new draft Policy D3.

92. We are concerned, therefore, to highlight the need for ‘saved’ policies in the 2003 Plan which have not specifically been superseded to be preserved and given currency pending adoption of the Local Plan (Development Management Policies).

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4321</th>
<th>Respondent: 8561377 / The Guildford Society (Julian Lyon)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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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</tbody>
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95. There is more within the transport aspirations to commend than to condemn.
96. LEP3 and Enterprise M3 input is good news. These may be subject to EU funding, and, following the ‘Brexit’ vote on 23rd June, there may be some doubt as to whether it will come forward.
97. The sustainable movement corridor is welcomed in principle but this also needs to extend southwards towards
Shalford and Artington to achieve the greatest modal shift.

98. The Guildford Society has doubts that much of this will not be confirmed to be deliverable without having funding in place quickly—this may affect the soundness of the Local Plan.

99. We need a strategic plan to achieve affordable and sustainable commuting to better service our physically constrained gap town.

100. The Transport Group doubts that sufficient thought has been given to flexibility in sustainable inter-modal transport planning especially for Guildford Railway Station, where The Guildford Society strongly believes a transport interchange should be located. The considerable modal shift demanded puts the onus on the rail network with which Guildford (town and Borough) is richly endowed.

101. The Guildford Society strongly supports and advocates Guildford Vision Group’s proposed bridge linking York Road to Madrid Road to free up the town centre.

102. The Transport Group acknowledges that parts of the Transport Evidence Base are essentially work in progress, but show worthwhile application of analytical resources.

103. This applies particularly to work on the sustainable movement corridor, and the time is ripe for early consultation with the teams involved.

Local Economy Group Comments

119. The Guildford Society is concerned that the Plan lacks a proper economic statement, that the Evidence Base does not appear to link coherently to the Borough’s Economic Strategy and that some of the crucial messages are absent from the Draft Local Plan.

120. Owing to the missing references to the Economic Strategy, there is no mention of Gross Value Added (‘GVA’) arising from the University, the Research Park, the technology sector generally, etc.

121. We are aware that the Council has received economic reports and that these highlight all economic sectors and a SWOT (Strengths, Weaknesses, opportunities and Threats) analysis of the local economy. This needs to be available alongside the Draft Plan.

122. The Plan provides insufficient focus on housing constraints for skilled workers as distinct from the shortfall of affordable homes.

123. There is an important decision to be taken about retail expansion—which has a low impact on GVA and typically lower skill levels—versus higher GVA sectors of the economy. This is reflected in a general shortfall in specified areas in the Plan for high quality town centre office space to attract large companies and head offices.

124. We strongly believe the Plan needs to have sufficient teeth to change attitudes where developers typically supply viability assessments for all major developments to show that affordable housing thresholds cannot be met. The viability report in the Evidence Base needs to be given much more prominence and the Plan Policy should refer to the need to rigorously apply the RICS Guidance Notes to viability assessments.

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

Attached documents:

Comment ID: pslp173/551  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

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

AIR QUALITY ASSESSMENT (AECOM JUNE 2017)

M. In the Introduction to this report, Aecom note that “The air quality review presented in this report has considered the potential effect of the proposed Draft Local Plan on annual mean concentrations of NO2, PM10 and PM2.5 for sensitive receptor locations within the GBC administrative area. These pollutants have been considered as these are the key pollutants associated with exhaust emissions and these are the pollutants of greatest concern generally within the UK... In summary the findings of the air quality review suggest that the effect of the Draft Local Plan on annual mean NO2
concentrations will be negligible and not a key constraint on development in the majority of the GBC administrative area. However, further detailed modelling would be advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors…”

N. It is difficult to understand how modelling could have been carried out in the town centre where there simply is no plan.

O. The study finds there will be ‘negligible change’. This means there will not be any significant improvement, which, given the modelling carried out in Guildford by Goel and Kumar (Annex 3), is frankly disappointing.

P. Changes in traffic flows that may lead to a significant change in air quality include where annual average daily traffic (“AADT”) flows will change by 1,000 vehicles.

Q. In a response to an enquiry made under the Environmental Information Regulations (attached at Annex 4) ref: FOI2016/00440, Guildford Borough identified that the expected impact of the proposed development of 1800 units around 11 miles from Guildford town centre would generate 331 vehicles entering the gyratory during the three hours of the morning peak.

R. It is difficult to believe the development over the plan period of 12,426 homes in the Borough, added to many thousands of homes in neighbouring boroughs, will not, therefore, have an impact of many times the 1,000-vehicle threshold for a likely significant change in air quality.

S. Air quality in the town centre is already poor due to the volume of standing traffic on the gyratory and approach roads at peak hours. It will inevitably get worse.

T. Guildford does not have many electric vehicle charging stations and there is no clear guidance in the local plan – and a general shortfall in electricity infrastructure – to encourage many more charging stations to be built.

U. Bizarrely, the Aecom report makes no significant reference to the town centre. The Guildford Society believes that makes this part of the evidence base not fit for purpose.

ASSESSMENT OF THE VIABILITY OF CARBON EMISSIONS TARGETS FOR NEW BUILDS (2017)

V. We have nothing particular to add to the study by Evora Edge, and support the aspiration to reduce our carbon footprint in development.

EMPLOYMENT LAND NEEDS ASSESSMENT (AECOM UPDATE MARCH 2017)

W. On page 5 Aecom has cited the plan period as 2016 to 2034, reducing the period by a year. This time period translates to the employment targets used in the local plan and the figures in the plan may, therefore, be inaccurate.

X. We note the comment made by AECOM: “Where sites are available the Council could seek to encourage office/R&D development in town centres. The town centre is a more sustainable location and there is evidence of demand from potential occupiers which currently do not necessarily have town centre offices that match their needs. The lack of supply of office/R&D premises in town centres is exacerbated by the loss of offices to residential from the prior approval permitted development regime.” We tend to support the approach Guildford Borough Council have taken to direct employment to locations that are easily accessible by public transport as well as cycling and walking.

Y. By our calculations, the local plan as drafted, will have an impact on GVA in the borough of circa £100m per annum in terms of new employment in the borough once all development is completed. We note that by optimising uses of planned buildings, this could be increased by another £70m by focussing on supporting high value employment in preference to relatively low value retail employment.
Z. We also note that if a comprehensive town plan was implemented as proposed by Guildford Vision Group, the gain in GVA in the borough would be even higher, probably at double the gain from the current Guildford Borough Council plan. This again highlights the strategic failings and lack of ambition in failing to bring forward a town centre plan contemporaneously with the local plan.

ENVIRONMENTAL SUSTAINABILITY AND CLIMATE CHANGE STUDY

AA. The document in the Evidence Base is undated and we are not certain as to whether this has been amended in any way.

BB. We have no reason to consider the information is accurate or not. It is clear that greater attention should be paid in the plan to master-planned flood risk management in the town centre.

EQUALITIES IMPACT ASSESSMENT SCREENING (2014)

CC. Out of scope for the consultation

GREEN BELT AND COUNTRYSIDE STUDY, VOLUMES 1-6 AND SUMMARY (2013 - 2015)

DD. Out of scope for the consultation, however, we can find no particular indication in the GBCS report to explain why Wanborough should be deleted from the plan (A47) and Send, for example, should remain in the site allocations.

STRATEGIC HIGHWAY ASSESSMENT FOR THE PROPOSED SUBMISSION LOCAL PLAN (SURREY COUNTY COUNCIL, JUNE 2016) - DELETED

EE. We assume the deletion relates to the incorporation of a different impact assessment document. [Transport Group?]

GUILDFORD TOWN AND APPROACHES MOVEMENT STUDY: STRATEGY REPORT (ARUP, MARCH 2015)

FF. All out of scope for the consultation

GUILDFORD STRATEGIC PARKING STRATEGY: STAGE 1: PARKING DEMAND (STEER DAVIES GLEAVE, AUGUST 2013)
GUILDFORD STRATEGIC CAR PARKING REVIEW: STAGE 2: CAR PARKING MANAGEMENT PROPOSALS (STEER DAVIES GLEAVE, AUGUST 2013)

GG. Both out of scope for the consultation although note our comments on the parking policies. We have (at Annex 4) included a paper, published recently by INRIX, showing the social and economic cost of town centre parking, where drivers spend time and fuel looking for vacant parking spaces. The Council should improve both access to and from car parks, but also informative signage and remote applications to direct drivers to the nearest available parking space(s).

GUILDFORD BOROUGH TRANSPORT STRATEGY (JUNE 2016)

HH. We are puzzled as to why the Evidence Base cites the 2016 report when there is a June 2017 version of Guildford Borough Transport Strategy. Our comments, therefore, relate to that document.

II. We note especially some of the comments on our transport networks, notably:

a. The adverse impacts of localised traffic congestion and/or high traffic volumes on the setting and amenity of communities, including in relation to road safety, severance, noise, air quality and the demand for parking, and also the discouragement to walking and cycling.
b. Severance of the town of Guildford and its constituent neighbourhoods resulting from a combination of the A3 trunk road, railway lines and the River Wey.

JJ. The Transport Strategy in respect of the Local Road Network includes (for the town centre) describes as **Committed Improvements**: Guildford Town Centre Transport Package including vehicle-targeted schemes (whatever those may be); Revised access to Millbrook car park; Experimental closure of Walnut Tree Close. It describes as **Anticipated Improvements**: None. It describes as **Aspirations**: Guildford Town Centre Transport Transformation Package, including vehicle-targeted schemes. **These packages are hardly enough to keep the town moving without any development. They do not indicate that the town centre will be ready for the level and scale of development envisioned in the local plan – ‘contingent’ upon infrastructure delivery.**

KK. There is a helpful schedule at the back of this report that bears at least some resemblance to Appendix C (see above) but is by no means identical.

GUILDFORD DRAFT LOCAL PLAN: EDUCATION REVIEW (MAY 2016)

LL. We have no particular reason to dispute this document excepting that the population numbers are not generally accepted and are being challenged by Guildford Residents Associations (GRA). We support their analysis.

MM. We note the reference to education provision in Guildford town centre:

- a. In-fill development in and around the town is likely to require mitigation between three and ten years of the plan. There are limited options for further primary expansion in Guildford Town. Alternative sites and options will be considered with local schools, alongside provision with strategic sites.

NN. We note there is provision for education in the Guildford Vision Group master plan for the town and we support their approach.

WEST SURREY STRATEGIC HOUSING MARKET ASSESSMENT (SHMA), SEPTEMBER 2015 - DELETED

OO. We note the deletion of the 2015 SHMA. Comments in respect of the up to date version are at the Housing Section, towards the beginning of this response.


PP. We have no specific comments on this update, save to stress our comments relating to the provision of SANG for town centre sites made earlier in this response.

HISTORIC ENVIRONMENT INFORMATION (2016)

QQ. We welcome this document although we do not understand why it still watermarked with ‘DRAFT’.

RR. As noted in our responses to the plan itself, we consider that the plan would benefit from a map of heritage assets and, in particular, an indication as to which sites are likely to require archaeological investigations.


SS. Out of scope for the consultation.


TT. The Land Availability Assessment Addendum does provide some insight into changes in allocation but does not explain why, for example, Flexford – Site Allocation A47 – is more sensitive than, say, Send.

UU. The housing trajectory in the plan (especially given the mathematical requirement to build 653 homes per year from 2015 to 2018 inclusive, looks to be unachievable from the graph in the LAA Addendum:
VV. The supply trajectory in the LAA Addendum is as follows:

[Table - Five-year housing requirements at 1st April 2017]

[Table - Housing supply at 1st April 2017]

LANDSCAPE (AND TOWNSCAPE) CHARACTER ASSESSMENT (2007)

WW. Out of scope for the consultation.

LOCAL HOUSING NEEDS SURVEYS

XX. As we have pointed out previously, the local plan would benefit from a much more robust (and accurate) Settlement Profiles Report. In this category, there is no assessment of local housing need for the entire urban area of Guildford, covering more than 50% of the Borough’s population.

LOCAL PLAN AND AFFORDABLE HOUSING VIABILITY STUDY (2014)

YY. Although as a 2014 document this is out of scope for the consultation, we are concerned that this document is out of date, cannot possibly take account of the additional burden of developers’ costs (Appendix C) and increases in construction costs in the meantime, and may make Affordable Housing much more difficult to deliver in the sort of numbers called for in the assessment of need.

MONITORING REPORT 2015/16 (2016)

ZZ. This document demonstrates the historic shortfall in housing delivery, and calls into question the robustness of the housing targets when considering the short term (four year) target of 653 homes per year implicit in the local plan.

OPEN SPACE, SPORTS AND RECREATION ASSESSMENT 2016

AAA. This document is out of the scope of the consultation.

RENEWABLE ENERGY MAPPING STUDY 2015

BBB. This document is out of the scope of the consultation

RETAIL AND LEISURE UPDATE STUDY (2014)

CCC. This document is out of the scope of the consultation

RETAIL AND LEISURE STUDY ADDENDUM (2017)

DDD. The Carter Jonas Addendum highlights demand for comparison retail floorspace and food and beverage at circa 47,000 sqm and 9,500 respectively, whereas the amounts in the draft local plan are at 41,000 sqm and 6,000 sqm – all of which is projected to be accommodated in the North Street development.

[Table 4.3: Forecast Food and Beverage Floorspace (sqm gross)]

EEE. Whilst the Guildford Society has a different view of both the prospects for and the desirability of retail space over the plan period, we do expect that the figures need to be consistent between evidence and plan.

FFF. Carter Jonas conclude that 32,665 sqm of comparison shopping is identified during the plan period to 2034 when food & drink (A3) is netted out.
RURAL ECONOMIC STRATEGY 2017

GGG. We have read the Rural Strategy (published during the course of the consultation) and, whilst it makes relatively little mention of the Local Plan, it does not seem to be inconsistent with it.

SETTLEMENT HIERARCHY (2014) AND PROFILES (2013)

HHH. Whilst these documents are notionally beyond the scope of this consultation, we have commented consistently, in every local plan consultation since they were first published, that they need to be corrected. They ideally need to be rewritten and the Guildford Urban Area needs to be broken into local communities to ensure the local plan is providing for local need across the Borough.

III. The local plan is deficient in many areas simply because there is not enough information for plan-makers to provide solutions and much-needed development and infrastructure.

SITES OF NATURE CONSERVATION IMPORTANCE (SNCIS)

JJJ. This document is out of the scope of the consultation.

STRATEGIC FLOOD RISK ASSESSMENT SFRA (2016) – LEVEL 1 AND LEVEL 2

KKK. Although these documents are out of the scope of the consultation, we are disappointed that much of the content of these documents has been passed over in creating the Flood Risk Topic Paper (2017) and, as a consequence, the plan does not deal comprehensively enough with resolving the flood risks from various different sources.

STRATEGIC HIGHWAY ASSESSMENT FOR THE PROPOSED SUBMISSION LOCAL PLAN (SURREY COUNTY COUNCIL, JUNE 2016)

LLL. Although this document is out of scope, it is also out of date. We do understand the Council’s rationale for retaining the older document because the amount of development is reduced, and so the effect on infrastructure is likely to be reduced too. On the other hand, a plan that is ‘contingent’ on infrastructure should have an updated account of the impacts of the developments in order to be able argue effectively the case for the infrastructure before development.

SURFACE WATER MANAGEMENT PLANS

MMM. Although these documents are out of the scope of the consultation, we are disappointed that much of the content of these documents has been passed over in creating the Flood Risk Topic Paper (2017) and, as a consequence, the plan does not deal comprehensively enough with resolving the flood risks from various different sources.


NNN. We note the Sustainability Appraisal Addendum settles on Guildford town centre to the effect that housing provision greater than is expressed in the local plan would be unsustainable:

“6.6.4 In-line with the sequential approach, there is a need to maximise growth in Guildford town centre, which means allocating or supporting land (henceforth ‘supporting’) for 1,150 dwellings. Whilst there are additional sites that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably, and so 1,150 dwellings was identified as a ‘given’ for the purposes of developing spatial strategy alternatives. N.B. the figure of 1,150 is 22 homes lower than the equivalent figure in 2016 (1,172 homes). The change reflects A) planning permissions; B) removal of the Telephone Exchange, Leapale Road (100 homes), on the basis that it is unavailable in the plan period; and C) addition of 200 homes at the North Street redevelopment, which is now understood to be suited to higher density development, given its central location.”

OOO. We believe Guildford Vision Group has illustrated a plausible solution for the town centre which could accommodate two thousand more homes. We firmly believe this should be investigated.
PPP. Significant for The Guildford Society Transport Group is the statement, as in 2016, that: “It is difficult to draw strong conclusions in the absence of detailed transport modelling evidence (a new Strategic Transport Assessment is in preparation, which will take account of proposed mitigation measures, e.g. junction upgrades); hence uncertain effects are predicted.”

QQQ. The vulnerability of the plan with respect to the Sustainable Movement Corridor being developed by Guildford Borough Council is revealed by the lack of any quantifiable benefit.

RRR. The proviso “leads to concerns” keeps recurring, and the conclusion is that the report does little to reassure as to the overall “sustainability” of the Plan.

SSS. The document itself seems to give a reasonable summary of the process and thinking behind it. We may disagree with the treatment by Guildford Borough Council of the town centre and its infrastructure in developing the local plan, but the appraisal itself seems to be complete and broadly supportive of the plan itself.

THAMES BASIN HEATHS SPECIAL PROTECTION AREA AVOIDANCE STRATEGY 2009-2016 (2010)

TTT. This document is out of the scope of the consultation, although please note our comments about SANGs for the town centre housing at various stages throughout our representation.

TRAVELLER ACCOMMODATION ASSESSMENT (20172)

UUU. We have no particular comment to make about this document.

WATER QUALITY ASSESSMENT

VVV. This document is out of the scope of the consultation

WEST SURREY STRATEGIC HOUSING MARKET ASSESSMENT (SHMA), SEPTEMBER 2015

WWW. This document is out of the scope of the consultation although we would draw attention to our response to the 2014 and 2016 consultations.

WEST SURREY STRATEGIC HOUSING MARKET ASSESSMENT: GUILDFORD ADDENDUM REPORT 2017

XXX. We do not accept GL Hearn’s methodology and consider the approach taken on behalf of the Guildford Residents Associations (GRA) to be more robust, considered and capable of interrogation. A copy of the report for GRA is attached (Annex 2)

WEST SURREY FUNCTIONAL ECONOMIC MARKET AREA (FEMA)

YYY. [We do not have any specific comments to make other than to note it varies from the previous Travel-to-Work Area and may not have enough reference to Aldershot, Farnborough and the Winnersh triangle.

FUTURE RESEARCH

Rural Economic Strategy
We have reviewed this document and are broadly supportive.

Land Availability Assessment (annual update)
Sites of Nature Conservation Interest NCI surveys (ongoing programme)

WHAT YOU TOLD US DURING EARLIER CONSULTATIONS

Proposed Submission Local Plan: strategy and sites (June 2016)
Local Plan Strategy and Sites Issues and Options Consultation (Oct – Nov 2013)
Who needs housing? (May-July 2011)
Core Strategy Further Options consultation (March - April 2009)
Core Strategy Preferred Options consultation (June - July 2006)
Site Allocations Issues and Options (November 2007 - January 2008)
OTHER LOCAL PLAN DOCUMENTS
Community Involvement in Planning (2013)
Local Development Scheme (2017)

OTHER PLANS AND STRATEGIES
Corporate
Guildford Town Centre and Hinterland Masterplan Report (Allies and Morrison Urban Practitioners, final draft report for consultation October 2015)
Guildford Borough Economic Strategy 2013-2031
Guildford Borough Corporate Plan 2015-2020
Guildford Town Centre Regeneration Strategy 2017

We note this has no planning status, but it represents the only attempt to plan the town centre referred to within the local plan itself. This is very disappointing.

Guildford Housing Strategy 2015-2020
Guildford borough Local Plan 2003
Planning Policy for Traveller Sites (2015)
South East Plan (2009)
Surrey Waste and Minerals Plans
Surrey Transport Plan (LTP3, 2011 and subsequent updates)
The Enterprise M3 Delivery Plan - 2014-2020

(Please Refer to image/Chats on uploaded rep)

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

**Attached documents:**

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**Comment ID:** PSLPA16/1521  **Respondent:** 8562273 / The Clandon Society (Christopher Dean)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. The Council was entitled to consider constraints before determining the housing number. We believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notably roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First we believe constraints should have been applied. Secondly we believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Having properly applied constraints if there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the Plan unless “exceptional circumstances” for development are proven in relation to that specific site,
as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:

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Comment ID: PSLPA16/4272  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

WHPC has very real concerns about the Proposed Submission Draft Local Plan 2016, the Evidence Base and the many assumptions that have been used to attempt to justify many of the policies. WHPC objects to:

1. the creation of new Green Belt boundaries simply for the purpose of insetting the village from the Green Belt without any NPPF requirement of ‘exceptional circumstances’ being advanced to justify such changes;
2. the extension of current village Settlement Areas to encompass Sites A37, A38, A39, A40 and A41 and additional areas of land for which no ‘exceptional circumstances’ are advanced to justify their being removed from the Green Belt;
3. the scale and density of new housing proposed on the 4 parish based development Sites and Site A 39 adjacent to the parish boundary with East Horsley Parish;
4. the Objectively Assessed Number (OAN) proposed by the West Surrey SHMA of 693 new homes per annum (13,860 total for the Plan Period) which represents a 25% increase in the housing stock of the Borough. [NOTE: An independent Review of the OAN in the West Surrey SHMA by N McDonald (Appendix 1) concludes that there are significant errors in the West Surrey SHMA adopted by Guildford Borough, without scrutiny, and the OAN should be 510 homes per annum not 693]. Another review of the West Surrey SHMA prepared by Guildford Borough Clandon & Horsley Ward Councillor David Reeve, totally independently of the Neil McDonald Review, found similar errors to those reported on by Mr McDonald;
5. West Horsley’s proposed share of Guildford’s growth which equates to a 35% increase on the current housing stock of 1120 homes. Such proposed growth for the village is grossly disproportionate and unsustainable;
6. the total absence of detailed and deliverable infrastructure proposals to support the proposed local developments. The existing infrastructure is overloaded and insufficient for the needs of today’s village population, let alone the proposed developments set out in the Local Plan. Thames Water in particular has indicated a lack of capacity to absorb just one, never mind all, of the housing developments proposed for West and East Horsley.

Like many of the Borough’s rural villages, WHPC has noted in Policy P2 the opening sentence, “We will continue to protect the Metropolitan Green Belt ... against inappropriate development”. The Parish Council and the village it represents, fully support this policy. Regrettably however the proposed delivery of some 65% of the OAN unconstrained housing need on Green Belt land, coupled with the proposed insetting of villages from the Green Belt, flagrantly ignores this most important part of the Policy. No Exceptional Circumstances are advanced for ignoring the requirements of the National Planning Policy Framework (NPPF) by the Borough to justify the removal of current Green Belt land to meet GBC’s questionable growth targets.

Part 2 of this Submission is A Planning Assessment Report on Sites A37, A38, A40 and A41 in West Horsley and Site A39 adjacent to the boundary with West Horsley, prepared by ADN Planning Ltd, the Parish Council’s appointed consultant. The Conclusions at Para 4.9 state:
In conclusion, all of the Sites allocated for development within West Horsley have been singularly and cumulatively, found to be inappropriate for development. The basis of the Settlement Hierarchy, in which West Horsley has been placed, has to be seriously questioned, and the adverse impact of each site upon the village on an economic, social and environmental scale, as demonstrated in this statement, provides a compelling case demonstrating that they would not deliver sustainable forms of development, nor would their inclusion be justified as exceptional circumstances for them to be removed from the Green Belt. It is therefore recommended that Guildford Borough Council remove all five sites from their Local Plan and re-assess their proposals to extend the Green Belt boundary within the village as potential future sites for future residential development.

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)
- GRA Report FINAL.pdf (1.6 MB)

Comment ID: PSLPA16/4562  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

General Comments:

Informative, clear aims and objectives.

Will help inform West Horsley’s emerging Neighbourhood Plan.

It is right to reference the old Planning Policy Guidance (PPG 17), as there is no clear replacement for this.

Methodology clear and well referenced – a transparent document.

How will you monitor the implementation of the policies? Is this going to be the remit of Parish Council’s or will this be the planning officers at GBC?

This is especially important as each Ward has been identified as having some form of typology deficiency which will be exacerbated should the scale of development proposed in the new draft Local Plan go ahead.

2.0 Methodology

The report states that it is based on a thorough understanding of local needs as detailed in the Community and Stakeholder Consultation.

However, I would query how representative the local need data is. If Guildford Borough has a population of 141,009 (mid ONS figures), then why was the online survey only sent to 3000 households as this is just over 2% of the Guildford population and is probably therefore too small a sample to produce justifiable evidence?

It transpires that only 411 surveys were actually completed by residents. Although it is mentioned that the survey was sent on a random basis, it would be helpful to see the results broken down by Ward, to ensure fair representation of the people who actually use the facilities, as well as a cross section of age and frequency of use.

3.0 Strategic Context

There are many references to the EU, especially when it comes to protecting Biodiversity, and adherence to many EU policies.
How will this be affected now that we are no longer a member of the EU?

Biodiversity 2020: A Strategy for England’s wildlife and Ecosystem services – how will the measures that are put in place be monitored? This is of particular concern as there is reliance on developers to deliver specific targets within their planning applications that protect our wildlife and green spaces. How will this be enforced?

3.3. Local Context – reference to the new Local Plan.

It is stated that a Local Plan Development Management Document will be produced to support the new Local Plan, if adopted. What would be the non-strategic, development management policies that are mentioned? Will you be working with Parish Councils and Neighbourhood Planning teams to identify these?

4.0 Local Needs Assessment

It is noted, and encouraging that the themes of need are consistent between GBC and Parish Councils regarding provision and deficit of Open Spaces.

5.0 Audit of Existing Open Space Assets

I note that there is no inclusion of Local Green Spaces. My understanding from our conversation is that this has not been included because LGS is a planning designation, and that LGSs will be designated through Development Management Policies which are to follow at some point.

6.0 The Development of Standards

6.2 Allotments

Although I don’t have figures to back this up, I feel that I must point out that West Horsley would be different in this area because of our thriving Grace and Flavour Community Gardens and Allotments. I believe this is reflected in the detailed analysis of need and deficit there we clearly do not have a deficit.

6.3 Amenity Green Space

Why have GBC reduced the Fields in Trust recommended standard of 0.6ha/1000 population of amenity space, to 0.4 hectares per 1000? I can see that the average current level of provision exceeds the recommendation, but that will not be consistent across the Borough.

We need to ensure that it does not become less, especially with the scale of development proposed for West Horsley and the East of the Borough in general, where these figures would be far from correct should the new draft Local Plan be adopted.

FIT do recommend that local circumstances are considered, but what are the circumstances that necessitate a reduction for Guildford Borough? Is this simply based on the fact that we have more of what we need already? But then how do we protect what we have, and ensure that there is more consistency of provision across the Borough? Food for thought…

The design requirements are good – how will they be enforced with developers? This applies to all typologies.

7.0 Applying Local Standards

It is recognised in the study that there is an under supply of the majority of typologies across the majority or Wards.

This is based on the ONS data for 2011. What will the picture look like for the East of the Borough in particular in five, ten, and fifteen years’ time, should the housing development recommended in the new draft Local Plan be accepted?

I do not see any reference to this, but believe that if there is already an under supply across the Borough, then this will become much greater with another 13,860 homes delivered by 2033. Surely these projections need to be factored into this report?
Although it states that Natural green Space is in sufficient supply across all wards, again what will this picture look like if you factor in all the development proposed?

8.0 Strategic Options, Policy and Management recommendations

It is noted that the issues are highlighted within this section, but not how they would be addressed going forward.

The Open Space Policy recommendations for the four key areas (protecting open space, enhancing open space, re-locating/re-designing open space, and new provision of open space) are detailed within the document and I would be interested to know when and how these proposed policies are likely to be adopted. There is no time frame within the document that I have found to confirm the next stages, and these would be helpful.

It would be interesting to note planned future engagement with Neighbourhood Planning teams across the Parishes, as this could be key to delivering the policies proposed.

Finally, although I pointed this out when we met, I do need to check that the maps in the Assessment of sites for Amenity Value produced by ethos have been corrected, as follows:

Page 47 – the land identified is in West Horsley, not East Horsley as written on the map.

This also applies to page 48 Weston Lea, also in West Horsley, not East, pages 53/55/56 Waterloo Farm, again in West Horsley, not East, and page 54 Manor Farm in West Horsley, not East.

I am sure the misnaming is a genuine mistake, and not reflective of GBC’s possible future vision to merge the two villages through the new draft Local Plan!

I hope that these comments are helpful, and I will await to see what happens next in terms of policy adoption. If there is further consultation planed, and the opportunity for Neighbourhood Plan Groups to be involved, then I hope you will add West Horsley to your consultation group.

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

Attached documents:
**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.

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

Attached documents:

This iteration of the Draft Guildford Local Plan is an improvement on the previous draft however it still has serious flaws.

It does not provide for the pedestrianisation of Guildford from the station to the High Street.

It does not satisfactorily address the gyratory traffic congestion, traffic accidents and air pollution. Preferred Scenario 2 of the Allies and Morrison plan will reduce traffic capacity by over 30% in the town centre thus reducing accessibility and the commercial success of the town with little environmental gain.

The hypothetical reliance on the idea of the sustainable movement corridor is seriously misplaced. The narrow approach roads the Guildford cannot accommodate dedicated bus lanes and the route is such that it will be unlikely to serve more than 20% of the Guildford catchment area. There has been no research or evidence of the likely demand for this service or comparison with other routes or the effect on the existing bus services or the detrimental effect it will have on other traffic flows that will be vital to Guildford proper functioning. The £90 million budgeted for this chimera will be a waste of money.

There has been no fully comprehensive origin and destination study of traffic into and out of Guildford that should form the basis for traffic infrastructure requirements.

The proposal that I made to Guildford Borough Council over 4 years ago for a bridge over the river and railway from York Road to link to Madrid Road and Guildford Park Road together with a tunnel under Bright Hill to link York Road to Millbrook has not been properly investigated.

There Has been no comprehensive plan for the future of the town centre.

There has been no proposal to comprehensively plan the Walnut Tree Close area to maximise its’ residential potential.

The housing requirement figure is excessive and more than double the historic increase in housing in Guildford and is unsustainable bearing in mind the current traffic congestion.
The A3 is already seriously congested particularly at the Dennis/Cathedral junctions due to the function of this section of the A3 trunk road as a local road. Proposals to repeat this error with a new all directions junction near the Clandon Road Junction will perpetuate this folly and make the A3 congestion a real handicap to Guildford’s successful functioning.

I attach some plans and ideas that would help give Guildford town centre a better quality environment and give some relief to traffic congestion.

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

Attached documents:
- doc20130601095923 A3 relief junction.pdf (601 KB)
- doc20141002113237 proposed bus routes.pdf (411 KB)
- Guildford T C masterplan.pdf (2.0 MB)
SHMA

• **reduced total housing target by 1,400 units** until end of plan period in 2034

_This is not a reduction, but a postponement or a delay_

• **reduced housing need from 693 to 654 units per year** – revised Objectively Assessed Need (OAN) for housing in updated Strategic Housing Market Assessment (SHMA): Guildford Addendum

• **sites removed completely from the plan – primarily for homes in rural areas** such as a large site in Normandy and Flexford for 1,100 residential units

_The Normandy site was not in the regulation 18 consultation or the Issues and Options and hence it was only removed from the most recent plan. It was also added at the last minute despite being safe guarded since the last plan and many doubt the intention to ever seriously consider this site but feel that this was added with a view to removing it, to demonstrate that the authorities are listening to communities._

• **updated sites with reduced numbers of homes during the plan period – primarily in green belt areas** such as Gosden Hill Farm and Blackwell Farm, with 300 fewer residential units at each site, due to phasing of delivery expected beyond 2034

_Again, the numbers are NOT reduced at all, they are merely delayed or phased and hence their whereabouts is inconsequential._

• **updated sites with increased numbers of homes – primarily brownfield in the town centre** such as 200 more residential units on the North Street redevelopment

• **updated sites for student accommodation and Travelling Showpeople** – such as Guildford College changing from 100 homes to 200 student accommodation units instead and land at Garlick’s Arch site that is now accommodating six Travelling Showpeople plots

• **new sites for employment floor space/industrial land** – such as land around Burnt Common warehouse is the new site for 7,000sqm of industrial land moved from the site at Garlick’s Arch

• **new rail station at Guildford West, Park Barn** – is now included as a site allocation

• **reduced total growth requirements** from last year’s Local Plan

SHMA

• **reduced total housing target by 1,400 units** until end of plan period in 2034

_This is not a reduction, but a postponement or a delay_
• **reduced housing need from 693 to 654 units per year** – revised Objectively Assessed Need (OAN) for housing in updated Strategic Housing Market Assessment (SHMA): Guildford Addendum

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*Again, the numbers are NOT reduced at all, they are merely delayed or phased and hence their whereabouts is inconsequential.*

• **updated sites with increased numbers of homes** – primarily brownfield in the town centre such as 200 more residential units on the North Street

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

Attached documents:
• A principal driver in this is the Strategic Housing Market Assessment (SHMA) commissioned by GL Hearn and calculated to be 693 per annum or a total of 13,860 houses to be built across the borough. In the previous draft Local Plan of 2014, a figure of 652 p.a. was arrived at giving a total of 13,040 houses, while four years ago it was approximately half this figure. There seems little logic or accountability in all of this. The calculation behind how this housing need is arrived at has never been explained and therefore there is a lack of transparency unacceptable in any serious consultation. An independent report commissioned by Guildford Residents’ Association has arrived at a much lower figure of 510 dwellings per annum. Now in the light of the recent Brexit vote to leave the EU this must radically affect many of the underpinning assumptions that were deployed in arriving at the 693 figure. This basic tenet of the draft Local Plan can only therefore be considered to be unsound.

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

Attached documents:

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Strategic Highway Assessment Report

1. I am not suggesting that a Borough-wide transport assessment is by any means easy to accomplish but the current approach commissioned by Guildford Borough Council is not fit for the purpose of Local. It is a high-level strategic model with a severely understated baseline. Various issues were raised by me in the previous consultation and these seem to have been ignored in the consultation responses given by Guildford Borough Council.

2. The Transport Assessment was held back until the start of the consultation period and was issued incomplete - much PM peak hour data being excluded. I requested the PM peak hour evidence from Guildford Borough Council but they delayed for ten working days before stating that they would not provide it and that it can only be requested as a response to Evidence. This is unsatisfactory and there is no reason why it should not have been published for the consultation. Residents are every bit as concerned about their journey home as their journey to work. I can only speculate as to why the evidence was not published.

3. The evidence that is available in the Transport Assessment suggests that congestion on the local road network will be worse following completion of the proposed developments and assuming that all the highways schemes are delivered. More congestion means that the Borough will be less attractive to businesses and visitors, and a less desirable place to live with higher levels of stress and pollution.

Here are some quotes from the Report:

"4.5.10 Currently it is unclear why some minor roads in or just outside Guildford town centre are showing increases. These include roads such as Nightingale Road, Denmark Road and Tormead Road. However, it could be related to re-routing occurring as a result of the improvements to the A3 through Guildford attracting drivers to both join the A3 and remain on the A3 at Guildford and weaving through local streets."

"4.8.3 At the same time, average vehicle speeds increase not just on the A3 but across the network within the borough as a whole. However, despite this it should be noted that although the average speed across the network in Scenario 5 is
higher than in Scenario 1 (the Do-Minimum), there are differences within the network with average speeds on A roads and minor roads lower than in Scenario 1."

(In other words, traffic congestion on the local road network is predicted to be worse under this draft Local Plan even though existing traffic flows have been understated. With understated traffic flows, many roads and junctions would have some capacity to absorb additional traffic. If realistic current flows were used the impact of additional traffic would be far greater as junctions are already overloaded and additional traffic simply adds to queue lengths.)

"4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.

4. The source of baseline data appears to be incomplete and, where it is available, seems to rely on single day or one week surveys conducted at various times over the last few years.

5. The Transport Assessment understates existing traffic levels by using a process of averaging over the three peak hours.

Averaging leads to a very substantial understatement of existing traffic levels. I was able to identify the source of some of the "observed" data (listed in the validation report) for my local roads and this shows that the effect of averaging can be to produce a flow rate that is very significantly lower than the peak hour flow.

It is clear from the recent Wisley Airfield planning application that Highways England find the averaging approach unsatisfactory for the strategic road network and there is no justification for using it on the local road network.

Guildford Borough Council's attempt to justify averaging on the grounds that the actual peak time varies across the network is a red herring. An obvious way round this would be to carry out the modelling for each hour, or half hour, separately. My understanding is that this was not considered possible due to lack of resources.

The very major reduction from observed to modelled flow for Forest Road in the north-east bound direction may suggest that other roads in the vicinity, or on related origin destination routes, may have even more severely understated flow rates which have been "shared" across the road system by the modelling process.

Other examples nearby are Validation Report Count Numbers 2617 and 2618 - B2039 Ockham Road South where averaging severely understates the AM peak hour and modelling further reduces the baseline to between 40 and 50% of observed data.

On another local road, Old Lane, the PM flow northbound for one link is stated to be 86 vph but the modelled flow is only 1vph!

It appears that the Ockham and Horsley area has been very poorly modelled with the consequence that the very severe congestion and infrastructure failure that would result from the proposed developments has not been recognised.

Similar issues are likely to exist elsewhere in the Borough.

I would add that reliance on a single day survey is not good enough. Week long surveys, demonstrate how much traffic can vary from day to day and, to test the resilience of the road network, highest daily flows should be used - with proper allowance for the effects of queuing at the survey point. The surveys should be carried out when traffic is not reduced by holiday periods, school closures or other events such as roadworks that might divert traffic away from the road in question.

6. The result of modelling understated baseline flow rates is a failure to fully identify existing congestion hot spots. Given that, despite this, the transport assessment shows that congestion will be worse on the local road network it is clear that the reality will be far worse, and widespread, and that the highways infrastructure requirements have been severely underestimated.

7. Guildford Borough Council intend to reduce road space in the town centre in order to tackle congestion there. It is clear that they cannot apply the same approach across the Borough as that would deter businesses from operating in Guildford.
and discourage visitors. The Plan proposes massive levels of growth outside the town centre and that will lead to highway infrastructure changes that require demolition of property, road widening through villages and residential areas and, in all likelihood, demand for by-passes that would have to run through countryside including the AONB. In fact, it is difficult to envisage where such by-passes would be put without serious damage to the environment and the existing tourism economy. I object to planning for such massive growth in the Borough where such dire consequences would be inevitable.

8. My requests for details concerning the way junctions are dealt with in the model, and the details for three local junctions, went unanswered by Guildford Borough Council and Surrey County. It is my belief that SINTRAM uses only a very crude approach to assessing issues at junctions and concentrates only on link capacities and the associated ratios of link flow to capacity (RFC approach). The separate "Level of Service" (LOS) approach appears to be limited to just a small selection of the many congested junctions across the Borough.

An example of the effect of averaging is given below:

Validation Report Count Numbers 2513 and 2605 - Forest Road

A single day Surrey County Council traffic survey was carried out on 6th November 2012 at the junction of Forest Road, Horsley Road and Howard Road with the results for peak hours subdivided into half hour periods. The average peak hour figures (AM) from this survey were 278 vehicles per hour (vph) and 142 vph and these correspond exactly with the observed flows in the validation report.

However, the corresponding peak hour flows (08.00 to 09.00) on that day were 371 vph and 187 vph. The observed flows have been taken as 75% and 76% of the peak hour due to averaging. The alternative way of expressing this is that peak hour flows were 33% (and 32%) higher than the chosen observed flow.

This is by no means the most extreme example and the effect varies but it should be obvious to anyone that averaging always reduces the peak hour flow and, in many cases, very significantly. Averaging can only make little difference in the town centre and on roads such as the M25, for example, where peak hour queuing is prolonged and results in lower measured flow rates spread more evenly (traffic that can flow rather than traffic that wants to flow). To obtain a clearer picture in these circumstances it is necessary to take account of changes in queue length - but this is not practical when the queues stretch back to affect other junctions. Questions also arise as to where the end of the queue (or queues) is defined to be.

Furthermore, in this example, the modelled flows are only 38% and 67% of the peak hour flow (observed peak hour flow is 2.63 times greater than modelled flow in one direction) - meaning that the methodologies described in the report as "fixed trip equilibrium assignment and method of successive averages" have had the effect of further reducing the flows modelled for this road link making it far less likely to register as congested.

Very long queues develop on a road that meets Forest Road at a junction and these are related to the flow rates on the road that has priority. If the priority road has an understated flow rate in the model then any technique that it uses to identify delays at its junctions with lower priority roads will also be understated. My questions related to the technique used by the model remain unanswered at the time of writing.

At non-signalised junctions the capacity of an approach arm on a road that does not have priority reduces as the flow on the priority arm increases. There is a "tipping point" at which the flow on the approach arm exceeds the capacity, queuing begins and increases indefinitely until this variable capacity exceeds flow.

At signalised junctions the capacity of an approach arm is determined by the proportion of "green" time available to it. This may be fixed or variable depending on the sophistication of the traffic light system and the way in which it shares time between the approach arms and any filter lanes.

At any junction, the tipping point for any arm may not be exceeded in a model that has understated flow rates. A simple case of "rubbish in, rubbish out".
9. The Link capacities used in SINTRAM are too high in my opinion having regard to local knowledge concerning the effect of pinch points and considering the implied gap between vehicles (bearing in mind that traffic does not flow evenly spread and weather and road conditions are not always ideal).

10. The proposed town centre road changes could have a substantial impact but they have not been incorporated in the model. A concern here is the impact of traffic diverting onto other routes following the proposed reduction in town centre road space.

11. Waverley and Guildford were modelled together but it is not clear whether other adjacent Boroughs have been dealt with adequately as they appear to rely on general growth factors rather than proposed site developments near Guildford that could have a very significant impact on our road network.

12. More traffic congestion means an increase in local air pollution with significant adverse effects on the health of Guildford's residents.

13. More traffic congestion will increase journey times for emergency vehicles making good outcomes for life-threatening incidents less likely.

14. The local road network is required to provide alternative routes for traffic when the strategic road network is temporarily closed or providing a severely reduced capacity. The existing local road network suffers major congestion and delays when this happens under current conditions and this will become far worse under the proposed increases in flows on strategic road network and the massive increase in local traffic that will be generated under this draft Local Plan.

15. I consider that the traffic evidence is inadequate for the purposes of Local Planning and my requests for information concerning the evidence that was provided were largely unanswered at the time of writing despite initial requests being made within a few days of the start of the consultation period. Please provide full answers to the following questions and requests:

16. I request full details of the TEMPRO factors actually used in taking the model from 2009 to Scenario 1 (Please do not just refer me to a website as you did in the consultation period. I want to know what was actually used in the model).

17. I request that the missing PM evidence be provided without further delay.

18. Why was the missing PM evidence not published at the same time as the rest of the report?

19. I request the number of nodes, number of links and number of origin-destination pairs included in the Guildford model.

20. Please list the origin/destination pairs used for trips in the Guildford model.

21. It has been suggested that SINTRAM allows for junction geometry and opposing flows. Is this the case for all junctions on the local road network?

22. Please explain what aspects of "Junction geometry" are used in the model.

23. Please explain what data items you put into SINTRAM to allow for the details of each junction.

24. Section 4 appears to imply that SINTRAM has junction capacities. Please advise the junction capacities used in SINTRAM for the following junctions, for each arm:

   Effingham A246/The Street/Beech Avenue
   West Horsley A246 Bell&Colvill roundabout
   B2039/East Lane/The Drift
25. How were the delays in Table 6 determined?

26. If SINTRAM uses a "mathematical" function to determine delays, please advise the function employed and the data items that it Please note that your initial answer "calculated in the model" is not an adequate response.

27. Table 3.1 includes some negatives - the most extreme being for the Boxgrove I have been trying to think why this might be. Please advise the reason for this.

28. I request a clear description of the LOS assessment process and a list of the junctions for which this assessment was carried out.

29. I request that detailed junction modelling (with realistic data) be carried out across the Local and Strategic Road Networks before sites are included, and that it is not left to developers to provide data and modelling as they have a vested interest in the results.

Model Development Validation Report

30. This appears to indicate that the model contains 408 road links. However, certain roads seem to be missing.

For example, a highly significant commuter route has developed across the AONB using Ranmore Common Road, Crocknorth Road and Greendene. This route, which crosses the Borough border, does not seem to appear in the list of road links in the validation report.

This particular traffic flow seems to consist of traffic taking a shorter route between the A24 at Dorking and the A246 at East Horsley as an alternative to main roads that involve regular, and frequently excessive, queuing at peak times. Much of this traffic travels at dangerously high speeds, cutting corners on a narrow, winding and hilly road with the occasional slow-moving cyclist commuter on uphill sections with blind bends. Some sections of the route can be very treacherous in damp or icy conditions. It is also used increasingly by HGVs including some that seem lost.

One possibility is that the model contains other links for there was no observed data and so it was not possible to validate them. My questions on this aspect were unanswered at the time of writing.

31. Some observed/modelled flows seem very low.

32. I requested more detail on the road links so that I could understand which section of a road was described and the direction. This information has not been provided at the time of writing. I was able to infer the detail for certain links through some consuming effort.

33. Please provide full answers to the following questions and requests in relation to the validation report:

34. It is good to see a list of validation data (Appendix A of the validation report) but for many links it is not clear which stretch of road the data relates. Also, the direction of travel is given in some, but not all cases.

I request that fuller detail be provided on the road links to indicate section, direction, capacity, trip origins and destinations that apply to the link (i.e. the first choice route for those origins and destinations), and the date (or date range where applicable) of the survey used for the "observed flow".

35. Are Greendene and Crocknorth Road included in the model?

36. Please provide a complete list of road links included in the model for which there is no observed flow data, together with the baseline modelled flows that are included for them.

37. Is the baseline modelled year 2009?

Green Belt and Countryside Study
38. This was not a true re-assessment of Green Belt land, was not requested with general consent, and no exceptional circumstances exist for making changes to the boundaries. Rather than consider the purpose and value of the Green Belt in restricting urban sprawl the study was driven by a consideration of where developers wanted to build and then made up reasons for moving the boundaries in order to accommodate them. The study was prepared by a company that represents the interests of developers.

39. The subsequent use of a "traffic light" system of sensitivities is a bogus attempt to justify erosion of the Green Belt when there are no exceptional circumstances for doing so.

40. I object to the Green Belt and Countryside Study request that it be excluded from the evidence and that no changes are made to Green Belt boundaries.

41. I object to the changes to settlement boundaries.

42. I object to the entirely new concept of "village boundaries" (introduced in this latest version of the draft plan) designed to encourage development in the Green Belt and request that they be scrapped. Furthermore, the boundaries chosen were inappropriate, and this aspect is dealt with in further detail for a local example under "Appendix H Maps" later in this letter.

43. I object to the insetting of villages. It will destroy their character by an insidious process of inappropriate development. Insetting will also have an adverse impact on biodiversity in villages where the relatively low density of housing makes them permeable to wildlife. For example, East Horsley makes an important contribution to the openness of the Green Belt due to its low average housing density, woodlands, open space and large residential gardens. It passes the NPPF test for remaining "washed over" in contradiction to the conclusions reached by the development industry study.

44. The Government and Guildford Borough Council have no mandate to undermine the integrity of the Green Belt and have broken election promises made at a time when they were fully aware of what they intended doing.

SHMA

45. The West Surrey SHMA cannot not be regarded as objective and residents were denied access to the underlying details. Guildford Borough Council even refused to scrutinise it. The referendum result has further undermined its credibility and I request that it be withdrawn from the evidence. The result of the EU referendum changes the future of migration to and from the UK. It is not simply a matter of government policy and one possible scenario is a net outflow of economic migrants for a number of years.

It makes no sense whatever to release countryside and Green Belt for development, against residents' wishes and with no mandate, when any development genuinely needed could be met using brownfield sites in sustainable locations.

The adoption of a grossly inflated housing number will result in forced growth - encouraging inwards migration that will consist mainly of commuters.

The student population has a highly significant impact on occupancy and the local market and should be dealt with separately for projection purposes. In my view this is essential in trying to understand Guildford's future population and the options for accommodating it.

The underlying ONS data reveals that the fertility rate is well below replacement level and this means that, once the effect of improved mortality has worked through, the population will only rise a little before declining in the absence of net inwards migration.

46. The ONS trend-based assumption that mortality rates will continue to improve significantly could be considered optimistic. In effect they are assuming that the trend will not be broken by any of the many events that could upset this rosy viewpoint.

47. A revised SHMA is needed, followed by the application of constraints for infrastructure, Green Belt and to protect our landscape and biodiversity.
KEY EVIDENCE

2. Additional evidence should include:

- Existing SNCI surveys, including those that took place in 2004-2007.
- Biodiversity evidence emerging from Neighbourhood Plans.
- Evidence obtained by requests to local naturalists and natural history societies including those with a specialist interest / expertise.

Concluding comments

As stated at the beginning, I require that the points that I have raised be included in the Examination process and that they are responded to.

In summary, this draft Local Plan would have an adverse impact on quality of life, biodiversity, agricultural production, and on local businesses through increased traffic congestion, loss of countryside and destruction of village communities. It will fail to provide genuinely affordable housing or meet genuine local needs. The evidence is weak, poor, misleading and, in some cases, absent. It is an attack on the quality of life, wellbeing and health of the residents of Guildford. The identified infrastructure requirements are merely the tip of the iceberg that will sink Guildford if this plan goes ahead.

Our Government and local authority will be failing in their duty if this plan is approved.

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

Attached documents:

Comment ID: PSLPA16/1910  Respondent: 8574369 / Douglas French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

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 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 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 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 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:
**Guildford Borough Proposed Submission Local Plan – Strategy and sites consultation**

Thank you for the opportunity to comment on the 2016 Guildford Borough Proposed Submission Local Plan: Strategy and Sites document and supporting documentation. Surrey Heath Borough Council wishes to make the following comments on the draft Plan and supporting documentation.

Surrey Heath Borough Council is pleased to note that most of the objections made to the 2014 Draft Guildford Local Plan consultation have been addressed. To this end Surrey Heath Borough Council no longer raise objections to the lack of evidence base, the identification of full objectively assessed housing need and the strategic growth location in the Blackwater Valley.

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

**Attached documents:**

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**Comment ID:** PSLPA16/4284  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

<full document attached>

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

**Attached documents:**

- [bfn representations to reg 19 gbc local plan 17 07 16(a).pdf](5.1 MB)

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**Comment ID:** pslp173/599  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

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

**Addendum documents**

**Addendum to SHAR 2016 (June 2017)**

This document is fundamentally flawed in its conclusion as was the original document in that the conclusion first bullet point claims there will not be a severe impact on the local and strategic highway network. This statement is flawed for the following reason:

“For simplicity numbers are rounded up in this example. If the lane capacity before severe impact occurs is 2,000 cph per lane, then if the lane is currently running at 1000cph an additional 20% will mean 1200 cph and no serious or severe impact will occur. If on the other hand the road is running at 1900cph and 20% is added then 2280cph will cause over capacity problems – the SHAR which fails to display current traffic levels in any rational sense, makes it impossible to assess effect of traffic flow increases. It simply displays increase (and alleged decrease in flows) while failing to accept that during the rush hour the A3 is running at approx 5800cph on a three lane road”

ANY increase in traffic as it is so near to capacity will have a severe and detrimental effect on the traffic flow! The Aldi site is a clear and recent example it was ‘only’ a 2% increase in traffic – but the roads were already at 100% thus severe delays occur at this location. SCC and Qualified Roads data specialist regularly and monotonously fail to take this fact into account during this planning process.
This road is ‘at capacity’ and ignored by the Aldi planning application and appeal. The additional pressure will cause grid lock and raise pollution levels in the process.

The map/ graphic following clearly shows that the only option to solve the congestion problems is as laid out in the History of the A3 north of the A320 in that a Tunnel (providing a total of four lanes south and four north is in reality the only option to cure the traffic congestion and pollution accepted as existing in and around North Guildford.

Conclusion statement 5.1.6 is irrational and totally unfounded each home brings with it 1.8 cars on average 10,000 homes is 21,000 vehicles with roads currently exceeding capacity there can be nothing but a ‘severe impact’ both congestion and air pollution.

Note: in the 101 pages of this document there is no calculation of the increase of North bound traffic going south into Burpham to access the North bound Lane of the A3 or its affect on Traffic heading East on Clay lane delayed by the large increase in traffic from The gosden Hill Park and ride departing in the evening.

From the Borough Economy and infrastructure document:

Note changes go beyond being minor in nature – but still fail to take any notice of Burpham resident’s comments. Noting on page 17 the display of the corridor to Gosden Hill right through the middle of Burpham (without consultation with Burpham) when the logical corridor for the park and ride buses would be onto the A3 and down to the A320 and into the town centre – for ‘Park and ride’ do not stop on the way thus do not need to be in Burpham at all, should a rational always junction sit on the A3 allowing rational access to Gosden Hill.

Charging for documents: During the Burpham Neighbourhood Plan the examiner ‘complained’ in his report that we could not charge £5.00 yet Guildford Borough want to charge over £300.00 for their local plan – is this disenfranchising the community?

Housing Numbers

The SHMA position within Surrey is clearly indicated by the diagram below – the Council was not elected on a ‘manifesto’ to build more than double that of any other borough in the county. The current ‘rational calculated level’ should be 404 per year which moves the rational number over 19 years of the plan to 7,676 which is still the highest level within Surrey! Noting this number is the raw number prior to reduction for ‘considerations’ in the process e.g. Green Belt and flood plain etc allowed for within the NPPF and NPPG. None of which have been included within the final number.

The SHMA document is the basis for all arguments on both housing and Industrial land allocation – this number must be rational and reasonable. The current document is well out of the statistical probability (standard deviation) summation of the whole of Surrey and on this point alone simply cannot stand unchallenged.

From the opengovernment.org.uk web site:-

“Priority 1: Extending the principles of openness and transparency
The public must be provided with easy access to accurate, credible, high value information in a format that can be easily read and understood, so as to ensure that key actors across the public, private and voluntary sectors can be held to account. Open government has three parts:

1. Transparency – opening up of government data and information on areas such as public spending, government contracts, lobbying activity, the development and impact of policy, and public service performance.
2. Participation – support for a strong and independent civil society, the involvement of citizens and other stakeholders in decision making processes, and protection for whistleblowers and others who highlight waste, negligence or corruption in government.
3. Accountability – rules, laws and mechanisms that ensure government listens, learns, responds and changes when it needs to.”

The current SHMA fails on these aspects of openness and accountability

**Topic Papers**

There is no indication that ‘topic papers’ form part of the Local Plan or simple additional pieces of speculative paperwork. Nor indication this information has been supplied to the public ‘as a component part’ of the local plan.

The Green Belt and countryside topic paper attempts to justify Exceptional circumstances as laid out in the NPPF stating ‘in general terms’ there are exceptional circumstances’

*General definition:* “considering or including only the main features or elements of something; not exact or detailed.”

*Exceptional definition:* unusual; not typical. This alone displays a misinterpretation of the word ‘exceptional’

How can justification for change of Green Belt lines for ‘unusual atypical’ reasons be claimed by stating ‘there is no exact reason or detail’.

[Image - 'Exceptional circumstances' 4.73]

From the 2014 Pegasus report vol ll Addendum 17 04 2014 clearly states such exceptional circumstances WILL NOT EXIST. Thus fundamentally undermining claims to move the current Green Belt Line

[Image]

[Image]

[Image]

Clearly the process is not being followed as it clearly states these are not the finalised documents to be submitted. Thus this plan fails in the requirement to provide a set of completed documents to the community for comment and they leave themselves open to make changes beyond the sight of the community again failing the open government test.

**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)

**Comment ID:** pslp173/697  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

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

We also have concerns regarding the manner in which evidence based documents have been updated throughout the local plan process. For instance, the Green Belt and countryside study was subject to a number of updates, leading to a
disjointed document, which in any case is no longer up to date given the changes to the local plan prior to the current restricted consultation at REG19, e.g. Appendix 8: Potential Development Areas, being a case in point fails to include the extended site at Gosden Hill. This chaotic content in excess of 200MB plus (greater than 1000 pages) of documentation with addendums to previous documents, means trying to access and assess the up to date text being used in the final plan is impossible, for both the local plan team and members of the public. A total re-cataloguing of the suite of evidence based documents used to create and support the final plan is required to make this Plan sound and justifiable. At this very basic level an Index of Documents is required complete with web site address where they can be found. A requirement for proportional evidence has not been met.

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

Attached documents:

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**Comment ID:** PSLPA16/3420  **Respondent:** 8581601 / Mr James Winborn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The proposal is to construct approaching 14,000 new homes in the Plan period. This seems to us a very large number proposed by the Strategic Housing Market Assessment which should be subject to rigorous scrutiny. However the methodology used in arriving at this figure has not been generally revealed or even revealed to Guildford Borough Council. This seems extraordinary and indeed undemocratic to us as it is the basis of much of 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:** PSLPA16/2929  **Respondent:** 8582017 / The Clandon Society (J Wright)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base
and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

APPENDIX D

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

Attached documents:
Hampshire County Council welcomes the opportunity to comment on the draft Guildford Borough Council Local Plan and supporting documentation. As an adjoining Highway Authority the County Council wishes to comment on the transport implications arising out of the Local Plan Strategy as set out in the Transport Evidence Base; comprising of both the Guildford Borough Transport Strategy 2016 (Guildford Borough Council, June 2016) and the Strategic Highway Assessment Report (Surrey County Council, June 2016).

The Strategic Highway Assessment report acknowledges that it is likely that a reasonable proportion of traffic will travel into the neighbouring borough of Rushmoor. The potential developments set out in the Local Plan have been modelled using Surrey County Council’s Strategic Transport Model SINTRAM. The modelling results show that the potential developments could lead to an increase in traffic on roads leading into Hampshire’s road network via links such as the A31, A323 and A3011.

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

Attached documents:

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Comment ID: PSLPA16/3754  Respondent: 8586369 / Mr Luigi Fort  Agent:

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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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: PSLPA16/3617  Respondent: 8586785 / Elizabeth Critchfield  Agent:

GBC advocates building 13,860 homes during the period of the Plan – 693 dpa according to the SHMA. This begs a few questions.
Why can we not know the calculations used to reach this figure, over twice the number promulgated four years ago?

Why have GBC said that we can trust the model the consultants have used because many other local authorities have done so? This shows either a distressing gullibility or appalling arrogance.

On the one hand we are told that the OAN is deliverable, on the other we are informed of constraints that may affect deliverability; how can we be asked to approve something which does not offer a realistic target number that takes all constraints into account?

Why has GBC not imposed constraints to overall housing growth when other boroughs have? Guildford is a congested gap town yet little effort seems to have been made to preserve its urban or rural character, or maintain the unique identities of its villages.

Why is the level of expansion in the north of the Borough so disproportionate? Over 40% of the proposed total will be located within a few miles of Burpham, turning a pleasant village at the urban edge of Guildford into an anonymous built up area suffocated by traffic.

An independent report commissioned by the Guildford Residents Association (GRA) offers a much lower OAN of 510 dpa. The report found errors in the way student needs were calculated, a failure to correct historical data and flaws in the estimation of homes needed to support job growth.

It is clear that the housing figures quite literally do not add up, therefore they render the whole Plan unsound.

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

Attached documents:
GUILDFORD BOROUGH COUNCIL  
DRAFT LOCAL PLAN (PROPOSED SUBMISSION) CONSULTATION  
REPRESENTATIONS ON BEHALF OF ASHILL LAND LTD  
LAND AT TITHEBARN FARM, SEND

We write on behalf of our client, Ashill Land Ltd, to submit representations to the draft Local Plan (submission version) to support development at the site at Tithebarn Farm, Send. A site location plan identifying the land is enclosed at Appendix A.

Background to the Site
The site currently comprises a series of one and a half storey sheds with shallow pitched roof which are in storage use (B8 Use Class). In total there are 5 sheds and one hut on site which were historically used as chicken sheds. However, they have been in B8 storage use for 20 years and this has been confirmed by a certificate of lawful existing use or development (application ref. 16/P/00333) granted on 6th June 2016. As the sheds are purely within storage use they make no employment provision.

The buildings are surrounded by hard standing and there is a single vehicular access off Tithebarn Lane. This also serves the substantial barns fronting the road. The land to the north towards the A3 is open and to the east is a farmyard and farmland. To the south east is residential development with natural screening on the boundary fronting onto Tithebarns Lane. The site is located within the Green Belt and also within the 5 km buffer of the Thames Basin Heath SPA.

Summary of Representations and Recommendations
We submit these representations on behalf of Ashill Land Ltd, with particular interest to their site at Tithebarn Farm, Send. The representation is thus submitted in support development at this site for the following reasons:

1. The lawful use of the building is confirmed as storage (B8 Use Class) and therefore brownfield land within the Green Belt and can be developed under paragraph 89 of the NPPF.
2. Paragraph 89 of the NPPF supports the complete redevelopment of previously developed sites (brownfield land) and the draft Local Plan Policy P2 should adequately reflect the Framework.
3. We recommend that the threshold trigger for affordable housing within draft Local Plan Policy H5 is increased to 1,000 sq m or 10 or in line with the NPPG.
4. We suggest a flexible approach to the affordable housing policy to have further consideration to starter homes, viability and deliverability. In addition, to payment in lieu towards affordable housing where appropriate.
5. We recommend that the approach to the change of use of non-designated employment sites is reviewed to take into consideration the conditions of existing buildings for employment uses.
6. The development of the site would contribute towards the housing need within Guildford and offer a number of high quality dwellings.
7. The site is deliverable and viable to offer development in the immediate term. The representations, on behalf of our client, to the draft Local Plan (submission version) with regards to the above are set out in the following paragraphs. Green Belt Allocation and Policy The site is located within the Green Belt within the adopted Local Plan. Paragraph 89 of the NPPF states that local authorities should regard the construction of new buildings as inappropriate in Green Belt. However, exceptions to this are:
   - Buildings for agriculture and forestry;
   - Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
   - The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
   - The replacement of a building, provided the new building is in the same use and not materially large than the one it replaces;
   - Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the local plan; and
   - Limited infilling or the partial or complete development of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which 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.

Draft Local Plan Policy P2 ‘Green Belt’ states that the council will continue to protect metropolitan Green Belt, as shown on the proposals map, against inappropriate development. The policy dictates that the construction of new development
will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated. The policy further details that certain forms of development are not considered to be inappropriate. Proposals will be permitted where they are consistent with the local level criteria as set out in the draft policy. Specifically included within the draft policy is the criteria for ‘replacement of buildings’ within the Green Belt. The policy dictates the replacement of a building would be appropriate, provided the new building:
- Would be in the same use;
- Is not materially larger than the one it replaces; and
- Is sited on or close to the position of the existing buildings.

The supporting text of the policy states that when assessing whether the replacement buildings are materially larger, account will be taken of the forthcoming Green Belt SPD. The text justifying the policy further states that the replacement buildings are expected to be sited on or close to the position of the original building, unless it can be clearly demonstrated that an alternative position would reduce the overall impact on the openness of the Green Belt.

The draft policy distinguishes between three criteria including ‘extensions or alterations, replacement buildings and limited infilling’ within the main text. This classification of the acceptable types of development within the green belt is too narrow and does not go far enough to fully reflect the guidance for local authorities included within paragraph 89 of the NPPF.

The guidance within the NPPF is clear and confirms that ‘brownfield land’ within the Green Belt is appropriate development as long as it would not have a greater impact on the openness of the Green Belt than the existing development. The draft local plan policy should clearly state that the ‘limited infilling or partial or complete redevelopment of previously developed sites (brownfield land)’ is appropriate and furthermore the policy should not be restrictive to the same use as this does not fully reflect the policy in paragraph 89 of the Framework. The draft policy broadly follows paragraph 89 of the NPPF but does not go far enough to detail the acceptability for the replacement of buildings on brownfield land within the Green Belt. The NPPF is clear that exceptions to construction of new buildings within the Green Belt are appropriate where the land is classified as ‘brownfield’. This draft policy should be reviewed to include ‘development of brownfield land within the Green Belt is appropriate’ subject to the impact on the openness of the Green Belt.

We also note that the monitoring indicator of this policy is the number of appeals allowed involving development of the Green Belt and that the target is the reduction in the number of appeals allowed. We do not believe this is a clear monitoring indicator and the stance of it appears to be restrictive to development overall and not account for the clear policy tests within the NPPF. This monitoring mechanism should be reviewed to state that development in the Green Belt ‘not’ on brownfield land, to fully reflect the guidance within the NPPF.

Proposed amendments to Draft Local Plan Policy P2 ‘Green Belt’
- With the above in mind, we recommend amending the wording of the policy to read Replacement of a building, provided the new building:
  - Is on previously developed/ brownfield land;
  - Is not materially larger than the one it replaces, and
  - Is sited on or close to the position of the existing building.

Furthermore, we would recommend that the policy is broadened to include the tests included within paragraph 89 of the NPPF and not restricted to the three categories as currently drafted. Affordable Housing Policy Draft Local Plan Policy H2 ‘Affordable Homes’ details that the council will work with registered providers, developers and landowners to increase the number of affordable home in the borough to meet the identified need. The draft policy states that affordable homes will be provided:
- On sites providing five or more home, or sites of 0.17 ha or more regardless of the number of homes. At least 40 percent 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.
The policy dictates that the mix of affordable units and tenure split need to reflect the SHMA and 70% rented with the remainder being other forms of affordable housing. The policy confirms that affordable rent must be no more than the maximum level set out in recent housing guidance.

The supporting text of the policy does not go far enough to justify the trigger point of providing affordable housing on site at being 5 or more homes or sites of 0.17 ha in size. This policy has been derived from the SHMA and the update to Guildford Local Plan Viability and Affordable Housing Study. Referring to the SHMA it identifies that approximately half of all 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. However, the SHMA does not conclude or provide evidence that supports the draft policy that developments with the capacity of 5 or more units or 0.17ha should contribute towards affordable housing.

Although there is an identified need for affordable housing, the threshold as drafted within this policy at five or more units or sites of 0.17 is onerous. We object to this trigger point of 5 or more dwellings due to the lack of evidence base which supports this low threshold and trigger of affordable housing. Furthermore, the viability study of the draft policies states that the council should have a flexible approach to applying draft policy H2. This threshold brings into question the viability and deliverability of housing schemes and will ultimately jeopardise housing supply in Guildford. As per other boroughs the threshold for onsite affordable housing should be bought to 1,000 sq m as per the guidance included within the NPPG and recent appeal decision upholding the 10 unit threshold.

A recent appeal decision confirms that following the Court of appeal judgement dated 11th May 2016 that the obligations for affordable housing have been reinstated and refers to the NPPG. This states that such contributions should not be sought from development of 10 units or less and which have a maximum combined gross floorspace of no more than 1000m². The appeal was at 21 Clarence Avenue, London SW4 8LA (Appeal Ref. APP/N5660/W/16/3142911).

Viability and Affordable Housing

It should be noted that viability is determined by a range of elements including but not limited to, the density of the scheme, the location, the build costs incurred, the level of the sales values achievable and of key importance the benchmark land value. Therefore, this restrictive approach to seeking affordable housing from developments of five or more dwellings or 0.17ha does not account for these factors and could bring the viability of smaller housing schemes in question and therefore ultimately affecting the councils ability to achieve their housing target.

Starter Homes

The supporting policy text does not refer to the opportunity or inclusion of starter homes. As per national guidance these fall within the affordable housing definition and could be a solution to the affordable housing need in Guildford. The justification for this is that starter homes should be offered at a discount of at least 20% below market value and that they should cost no more than £250,000 outside of London.

The supporting policy text does not provide sufficient evidence as to why starter homes are not included within the affordable housing policy. We object to this exclusion in the policy and believe it is not in-line with the Government’s current consultation on national planning policy guidance. Furthermore, it does not follow the prescribed approach for the draft policy to be flexible.

Proposed amendments to Draft Local Plan Policy H2 ‘Affordable Homes’ With this in mind, we recommend amending the wording of the policy to read: As well as providing and managing affordable homes ourselves, the Council will work with registered providers, developers and landowners to increase the number of affordable homes in the borough toward meeting identified needs. These affordable homes will be provided:

- On sites providing 10 or more home, or sites 1000 sq m. At least 40 percent of the homes on these sites must be affordable homes, subject to viability.

The above amendment is in line with guidance in the NPPG, furthermore, the policy should be reviewed to include viability and the provision of starter homes as a type of affordable housing.

Loss of Employment Floorspace

Paragraph 51 of the NPPF supports the change of use of commercial buildings currently in Use Class B to residential where there is an identified need for additional housing in that area provided there are not strong economic reasons why such development would be inappropriate.
Draft Policy E3 ‘Maintaining employment capacity and improving employment floorspace’ states that in order to sustain and enhance employment capacity:

? Employment floorspace will be protected and the loss strongly resisted on the Strategic Employment Sites, which are defined in policy E1. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least two years.

? Employment floorspace will be protected and the loss resisted on the Locally Significant Employment Sites, which are defined in policy E1. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 18 months.

? Employment floorspace will be protected in line with latest needs assessment and the loss be resisted outside designated employment sites. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months.

We are making representations to the following part of the draft policy:

“Employment floorspace will be protected in line with the latest needs assessment and the loss resisted outside designated employment sites. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months”.

The draft policy further states that “once the period of comprehensive and active marketing is achieved, any other suitable employment use should be considered before change of use to residential or other use will be permitted”.

Proposed amendments to Draft Local Plan Policy E3 ‘Maintaining employment capacity and improving employment floorspace’

The policy as drafted is restrictive and covers all sites which are in employment use and not designated, furthermore there is a requirement to market these sites for 12 months continuously to provide evidence for a change of use. The draft policy does not take account for site specific characteristics which could impact and hinder the current employment use, this includes:

? The type of employment use;
? The employment generation of sites;
? The suitability and condition of the employment buildings;
? Economic viability for refurbishment;
? The availability and demand for the employment floorspace; and
? Flexibility in employment floorspace.

In addition, the NPPF does not require marketing evidence for employment sites. Therefore these factors of non-designated employment sites should be considered in the draft policy and a pro-active approach should be taken by the council assess the suitability of sites to remain in employment use. With this in mind, we recommend amending the wording of the policy to read:

“Employment floorspace will be protected in line with the latest needs assessment and the loss resisted outside designated employment sites. Change of use will be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months or where it can be demonstrated that the building or site is unsuitable for continued employment use”.

The supporting text should further be amended to take account of the proposed amendment above “once the period of comprehensive and active marketing is achieved or provided the existing employment floorspace is redundant and does not offer suitable employment generating uses, a change of use to residential or other use will be permitted”.

Please acknowledge receipt of our representations to the Draft Guildford Local Plan (Proposed Submission). We look forward to discussing matters with you further 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: PSLPA16/1564</th>
<th>Respondent: 8590753 / Mr Michael Anning</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum</td>
<td></td>
<td></td>
</tr>
</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: PSLPA16/437</th>
<th>Respondent: 8591169 / Michael Bruton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>I wish to OBJECT to the Draft Local Plan currently under consultation as follows:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I object to the housing number – 693 homes per annum. This number is far too large and is based on a formula which the Council has declined/failed to reveal to the public for analysis and indeed even to its own Councillors. Any figures are of course already redundant given the Brexit result with its impact on population numbers resulting from lower levels of migration.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. I object to the 693 housing number because constraints have not been applied to the number. GBC is 89% Green Belt and that alone should result in a significant reduction in housing numbers. Failure to consider infrastructure constraints (road congestion/lack of schools etc) is a failing in the Plan.</td>
<td></td>
<td></td>
</tr>
</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: PSLPA16/3421</th>
<th>Respondent: 8591169 / Michael Bruton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>• 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.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Attached documents:
How many homes does Guildford need, and why? It is clear that GBC have not convinced everyone that we need an annual target of 693 homes. However, I understand that GBC’s own analysis suggests that this could be factored down to approximately 360 homes achievable per year if Green Belt is an absolute constraint and no investment is put into A3 and other road improvements.

Will the decision to leave the European Union and the possible reduction in free movement of people have an impact on the OAN?

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

Attached documents:

Landlying to the north of Anchor Close, Normandy, Surrey GU3 2BT3.

**Site Location**

The site is located to the north of Anchor Close which is a small cul-de-sac of five dwellings in Normandy off the main A323 Guildford Road running from Guildford to Ash. The proposed site lies to the rear of numbers 2 to 5 Anchor Close. To the east, the site is bounded by a public footpath and Anchor Copse. To the north is a paddock and to the west are detached dwellings set in large plots.

*Fig. 1 Land Registry plan with site outlined in red*

- The site is located within the Green Belt and abuts the boundary of the Normandy settlement to the south and partially to the This is illustrated on the extract from the Normandy and Flexford 2003 Proposals map which follows:

*Fig. 2 Extract from Local Plan 2003 Proposals Map with site outlined in red*

- The site is a greenfield site used presently as residential It is under private ownership and immediately deliverable.

- It is within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area and is poor agricultural land (classification 4). It is located within Flood Zone 1 (low risk).

3.5 Assessment of Site Opportunities and Constraints

Shown below are photographs of the sites:

*Fig. 3 View of site from south east corner looking north west*

*Fig. 4 View of site from the south looking north east*

*Fig. 5 View of site looking east along boundary with 5 Anchor Close*
The site is located within the Green Belt but adjoins the Normandy settlement zone along the full length of its southern boundary. The minor alterations to the settlement boundary within the proposed Local Plan 2016 submission now include the large detached dwellings to the west. Should the redefined settlement zone be agreed, the site will be bordered completely on two sides. An extract from the proposed Local Plan illustrating this is included below:

The site is not within an Area of Outstanding Natural Beauty, Area of Great Landscaping Value, SSSI or SPA which cover the majority of the area. The site is protected by a Tree Preservation Order. A tree, approximately 10m to the south of the site, within the gardens of 1 and 2 Anchor Close has a TPO but this tree will be unaffected by any proposals for a residential development.

The developable site area is 4ha and therefore at a density of 30dph, 12 houses could be constructed. The surrounding settlement has a density of approximately 16dph. Therefore, should the density of the residential development be reduced to match its surroundings, 6-7 houses could be constructed on the site.

A new vehicular access could be formed in the south east corner of the site from Guildford Road. As illustrated within the photographs above, appropriate sightlines exist which would provide safe ingress and egress to and from the site.

Outside Guildford town centre, established urban areas, inset villages and identified Green Belt villages, the site is in a very sustainable area. A regular bus service also runs down Guildford Road (with a bus stop next to the site) linking the area to Guildford, Aldershot and Woking. It is just 20-25 minutes walk or a 7 minute cycle from Wanborough Railway Station which has two services an hour to Guildford taking just 7 minutes and two services an hour to Aldershot taking 11 minutes. The site is also only 3 miles from the Puttenham junction of the A31 Hogs Back giving excellent vehicular access to the rest of the borough and south to Farnham. It is well located for easy access to cycling routes.

1. Places of Workship (Wyke Church, St Marks, Emmanuel Church, RCCG Winners Place)
2. School (Wyke Primary School)
   - Garages (Hyundai Motors, Normandy Motorcycle Co)
3. Public House (The Duke of Normandy)
4. A number of local shops (Session Music)
5. Tennis and sports clubs (Guildford Archery Club, Normandy Tennis Club, Normandy Cricket Club)

Other facilities including Royal British Legion, Dog Obedience School, Nurseries

3.12 Site Planning History

The site was identified as potential development area J16-A in the Green Belt and Countryside Study. It scored three against the purposes of the Green Belt and is ranked 18th in terms of sustainability criteria. The site was classified as suitable, available and viable for residential development in the Strategic Housing Land Availability Assessment (SHLAA reference part of site 48). It was also included as site 46 within the draft Local Plan Strategy and Sites (regulation 18) document which went out to public consultation in 2014. This document concluded that if sufficient...
housing land cannot be found in the urban areas and village settlements, this site is potentially suitable for residential
development. A copy of the site analysis from this document is included within Appendix A.

3.13 Suitability for Inclusion within the Local Plan 2016

As discussed in section 2, the Local Plan submission proposes a number of large urban extensions and new settlements to
deliver the levels of assessed housing required over the 15 year plan period. Many of these sites are dependent on
infrastructure improvements which are yet to be agreed with the Department of Transport. Therefore, the majority of the
housing proposed is back-loaded to the later years of the plan and may not be deliverable within this time period at all.

- There is a shortfall within the Local Plan submission of housing which could be delivered in the first five years
of the plan This site could help reduce the shortfall as it is within a very sustainable location, available for
development and deliverable within 1 to 5 years. It has been assessed previously and found by the Council to be
suitable for residential development should sufficient housing land not be found in urban areas and village
settlements. The Local Plan submission does not meet this requirement and therefore the site at Anchor Close
should be promoted by the Council.

3.15 Comparison with alternative sites allocated within Normandy and Flexford

The Local Plan submission allocates two sites in Normandy and Flexford for residential development. Policy A46 is a
large village expansion between the two settlements and will be of mixed use including 1,100 new homes. Policy A47 is a
site on Land to the East of the Paddocks, Flexford and is allocated for 50 dwellings. Direct comparison between these
sites and the land at Anchor Close is clearly difficult given the differing scales of development but this site will have
considerably less impact on the landscape and ecology.

- An assessment of the landscape impact of development on these sites has been undertaken by Jon Etchells
Consulting; a practice registered with the Landscape Institute, with extensive experience of landscape design and
With regard to A47 he notes;

“The landscape to the west of Glaziers Lane is very different; it is more rural, relates far less to the settlement edge and
is of much higher quality. It is in productive agricultural use, is expansive with long range views across it, and contains a
number of large areas of Ancient Woodland. Development here would have significant adverse effects on the landscape,
over a wide area.”

And concludes that;

“This large scale development would be likely to have adverse effects on the setting of the nationally designated
landscape of the Surrey Hills AONB, as it would cover a large area and would include some large scale buildings for the
proposed secondary school, which is intended to be at the southern end of the draft allocation site, closest to the AONB.
This potential effect would be increased significantly if the AONB boundary were to be extended to the north into the
AGLV, as is currently under consideration.”

- In comparison, the landscape of the application site is small scale, enclosed and strongly related to the settlement
It contains no valuable landscape features, and would have no effects on the setting of the nearby AONB by
virtue of its limited extent, buildings of residential scale only and screening along its boundaries.

- The site at A47 is similar in landscaping terms to the site at Anchor Close as it abuts the settlement, is well
screened and comprises residential garden and However, the majority of it is designated as a SNCI and lies
within an area identified as a ‘water vole alert area’. A stream cuts through the centre of the site and potential
mitigation measures may restrict the actual developable area. It appears unlikely, therefore, that this site can
deliver the number of houses proposed and it seems somewhat perverse for the Local Plan to designate an area
for nature conservation value, but also propose its development, if there are alternative sites such as Anchor
Close available.

4.0 Conclusion
• It is considered that the site detailed previously is more suitable for delivering much needed additional housing within the borough than some allocated sites within the draft Local Plan. This site is within a very sustainable location, available for development and deliverable within 1-5 years.

• The site has been assessed previously by the Council and it was concluded that if sufficient housing land cannot be found in the urban areas and village settlements, this site is potentially suitable for residential development.

• The position of the site, adjacent to the Normandy settlement boundary, ensures much needed additional housing could be provided in a sustainable location with only a modest indentation into the existing Green Belt.

• The site is more appropriate for residential development in landscaping and ecological terms than other sites allocated within the draft Local Plan for Normandy and

• The site is in a sustainable location on a major bus route and a 20-25 minute walk or 7 minutes cycle from Wanborough. The site has easy highways access on to the A31 Hogs Back.

• The land is of poor agricultural quality and currently used as residential.

Appendix A Extract from

**Guildford Borough Council’s 2014**

**Local Plan Strategy and Sites Issues and Options Regulation 18 Consultation**

<table>
<thead>
<tr>
<th>Site Ref</th>
<th>46</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land near Anchor Copse</td>
<td></td>
</tr>
<tr>
<td>Ward</td>
<td>Normandy</td>
</tr>
<tr>
<td>--------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Site address / location</td>
<td>Land near Anchor Copse, Normandy</td>
</tr>
<tr>
<td>Site area</td>
<td>1 ha</td>
</tr>
<tr>
<td>Current use (s)</td>
<td>Pastoral farmland</td>
</tr>
<tr>
<td>Surrounding uses</td>
<td>Residential and open land</td>
</tr>
<tr>
<td>Ownership</td>
<td>I Private ownership</td>
</tr>
<tr>
<td>-----------</td>
<td>---------------------</td>
</tr>
<tr>
<td>Assessment</td>
<td>I SHLAA - part of site 48, GBCS - potential development area J16-A</td>
</tr>
<tr>
<td>Considerations</td>
<td></td>
</tr>
<tr>
<td>(including designations, any known contamination)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Green Belt adjoining the settlement boundary.</td>
</tr>
<tr>
<td></td>
<td>• Within 400m-5km of the Thames Basin Heaths Special Protection Area.</td>
</tr>
<tr>
<td></td>
<td>• Greenfield land.</td>
</tr>
<tr>
<td></td>
<td>• Flood Zone 1 (low risk)</td>
</tr>
<tr>
<td></td>
<td>• Poor agricultural land (classification 4)</td>
</tr>
<tr>
<td></td>
<td>• Delivery is subject to sufficient SANG land being identified.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Redevelopment uses</th>
<th>Potential</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing, e.g., market housing with a proportion of affordable housing</td>
<td>Good</td>
<td>The site is identified as potential development area J 16-A in the Green Belt and Countryside Study. The potential development area scores three against the purposes of the Green Belt and is ranked 18th in terms of sustainability criteria. The site is classified as suitable, available and viable for residential development in the Strategic Housing Land Availability Assessment. If sufficient housing land cannot be found in the urban areas and village settlements, this site is potentially suitable for residential development.</td>
</tr>
<tr>
<td>All affordable housing</td>
<td>Fair</td>
<td></td>
</tr>
<tr>
<td>-----------------------</td>
<td>------</td>
<td></td>
</tr>
<tr>
<td>Retirement housing/care home for elderly, student halls</td>
<td>Fair</td>
<td></td>
</tr>
</tbody>
</table>

Whilst 100 per cent affordable housing would be an option, it would depend on the local need in the area. There is a need for market housing as well as affordable housing, and this site could contribute affordable housing as part of market housing scheme.

Retirement housing/care home may be suitable on this site, but it would depend on need and whether there are any alternative sites outside of the Green Belt. This site would not be suitable for student accommodation.

<table>
<thead>
<tr>
<th>Employment (B1 use classes)</th>
<th>Poor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employment (B2 and B8 use classes)</td>
<td>Poor</td>
</tr>
</tbody>
</table>

This site is not well located to accommodate modern offices, and this is an out of town location.

These are land intensive uses. and would not make the most efficient use of this land, nor would they be suitable in a residential area as large vehicles would be needed to access the site, and the uses can often be noisy.

<table>
<thead>
<tr>
<th>Retail</th>
<th>Poor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food and Drink</td>
<td>Poor</td>
</tr>
<tr>
<td>Leisure</td>
<td>Poor</td>
</tr>
</tbody>
</table>

The site is outside of the town centre and would not be sequentially preferable for retail uses.

The site is outside of a main centre and would not be sequentially preferable for a food and drink use.

The site is outside of a main centre and would not be sequentially preferable for a leisure use.
<table>
<thead>
<tr>
<th>Community uses</th>
<th>Fair</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotel</td>
<td>Poor</td>
</tr>
<tr>
<td><strong>Suggested uses</strong></td>
<td><strong>Housing</strong> (including some affordable housing)</td>
</tr>
</tbody>
</table>

Hotels are a main town centre use and should be located in the main centres where possible. A sequential test would need to be passed to show that there are no suitable sites in the main centre or edge of centre, and that this use was needed. It is not thought that a hotel would be a viable use for the site.

A community use could be included as part of a primarily residential development, but

See Attachment for pictures and tables

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

**Attached documents:**  [MCA Represenations on Plan 5 Anchor Close Final.docx](#) (1.5 MB)
Compton and Binscombe. Built in the reign of Elizabeth I, the estate has seen significant changes in recent decades, including changes to farming and the growth of new activities. In the last 15 years the leisure and events business has been developed and a wide variety of businesses have moved onto the estate into refurbished buildings.

Loseley Park is an important open space in Guildford that makes an important contribution to leisure provision in the Borough in addition to supporting local business interests.

We enclose the following information as part of these representations:

- This supporting letter;
- Maps identifying land on the Loseley Park estate, which have been identified by the Council as being accessible open space (Appendix 1);
- Map identifying three sites - land adjacent to Mount Brown, Artington; The Paddock, adjacent to Sheiling, and land opposite Artington Park and Ride (Appendix 2);
- Completed Response Forms for the following policies:
  1. Policy S1 - Presumption in favour of Sustainable Development
  2. Policy S2 - Borough Wide Strategy
  3. Policy P1 - Surrey Hills Area of Outstanding Natural Beauty
  4. Policy P2 - Green Belt
  5. Policy E1 - Sustainable Employment
  6. Policy E2 - Location for new employment Floorspace
  7. Policy E3 - Maintaining Employment Capacity and Improving Employment Floorspace
  8. Policy E6 - The Leisure and Visitor Experience.
  9. Policy 11 - Infrastructure and Delivery
  10. Policy H3 - Rural exception housing

Representations in relation to Open Space, Sports and Recreation Assessment -

**Background Study**

I have already drawn to the Council’s attention the concerns of Loseley Park regarding the Open Space, Sports and Recreation Assessment, which forms part of the evidence base in support of the Local Plan, in a letter to the Planning Policy department dated 11th July 2016. Our comments are also included below as part of this consultation.

Our primary concern regarding the Open Space Assessment is that it refers to areas of land on the Loseley estate that are labelled within this study as ‘accessible’. This would imply it is publicly assessable and unrestricted. However, this land is private and whilst some of the land can be accessed by way of Public Rights of Way, most of the land identified is not publicly accessible. Please refer to the accompanying maps at Appendix 1 to these submissions when reviewing the comments below.

1. **Ashen Copse** - Whilst referred to as accessible, there are no Public Rights of Way within this area of private woodland.

1. **Puddock Copse** - Whilst referred to as accessible, there are no Public Rights of Way within this area of private woodland

1. **Pipkin Copse** - Whilst referred to as accessible, there are no Public Rights of Way within this area of private woodland.

1. **Bummoor Copse** - there is a Public Footpath running through the centre of this woodland, however, apart from the footpath width, the rest of the woodland is private and not accessible.
1. **Hurtmore Wood** - We understand this small area of woodland has been included incorrectly in the land owned by Puttenham Golf Club. The area of woodland owned by the Estate is private with a Public Footpath running through it.

1. **Loseley House and Home Farm** - The area coloured green on the proposals map is marked as private space. Loseley House and the immediate gardens are open to the General Public throughout the summer. However, the entry also includes private fields, private residential properties and private commercial let units.

1. **Land at Arlington** - It is difficult to see from the proposals maps but we believe a small area of land has been included at This is private land and has no Public Rights of Way.

1. **Land to the South of New Pond Road** - An area of farmland to the south of New Pond Road has been included as "Outdoor Sports (Private)". This land is private agricultural farmland with no public access.

Loseley Park requests that the Council remove these areas of land from this evidence base document. Notwithstanding our position on this matter, should the Council seek to maintain this land within the evidence base document on the basis it serves a purpose as open space adjacent to a recreation function, we request the land be clearly labelled as private and inaccessible so as to avoid any confusion and ensure there is greater clarity within the document. Please contact us if you wish to discuss this matter further.

**Sites with Development Potential in the ownership of the Loseley Park**

We wish to bring to the Council's attention the following parcels of land within the ownership of Loseley Park, which in our view are suitable, available and achievable within the medium to long term.

**Land adjacent to Mount Brown, Arlington**

This land could be included as a logical infill plot. The site could potentially hold 30 dwellings at a density of 16 dwellings per hectare. Whilst located within the Green Belt and AONB/AGLV the draft local plan is seeking to release similar such sites for development over the life of the plan period and is located adjacent to the Mount Brown site. The emerging policy context supports appropriate levels of infilling.

<table>
<thead>
<tr>
<th>Location:</th>
<th>See map at Appendix 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Size:</td>
<td>1.86 ha</td>
</tr>
<tr>
<td>Current Use:</td>
<td>Vacant Land</td>
</tr>
<tr>
<td>Potential Future Use:</td>
<td>Residential Use</td>
</tr>
</tbody>
</table>

**The Paddock, adjacent to Sheiling**

This land is located adjacent to existing residential accommodation and forms a logical infill plot on a gap site. Whilst located within the Green Belt and AONB/AGLV the draft local plan is seeking to release similar such sites for development over the life of the plan period. The site could potentially hold approximately 6 dwellings along its road frontage with The Ridges. Loseley Park is willing to consider the site for 100% affordable housing and would be happy to discuss this possibility with you.
Location: See map at Appendix 2

Site Size: 0.4 ha

Current Use: Vacant Land

Potential Future Use: Residential Use

Land Opposite Arlington Park and Ride

Loseley Park has land adjacent to the existing park and ride car park at Artington. To cater for growth in the region, this land could be included as a logical extension to the site and serve a further increase in parking demand. Although within the Green Belt, the principle of park and ride use has already been established in this location.

Location: See map at Appendix 2

Site Size: 2.76 ha

Current Use: Vacant Land

Potential Future Use: Park and Ride

The above three sites have the potential to make an important contribution to employment, housing and infrastructure provision in the Borough. We would be grateful for the opportunity to meet with you to discuss the planning merits of the above site in more detail.

Conclusions

In summary, we believe the draft Plan could benefit from the minor changes set out in the enclosed representations. Loseley Park makes an important contribution locally to leisure and business uses in the Borough as acknowledged by the Council. Loseley Park remains committed to making sure the estate continues to make this important contribution into the future and therefore trusts you will give due consideration to the development potential of the above sites.

I trust the above comments will be passed to the Local Plan inspector when the Local Plan is submitted for Examination in Public (EiP). We reserve the right to make further representations and attend the Examination in Public if necessary.

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

Attached documents:
- Appendix 2 - Land Adjacent to Sheiling.pdf (195 KB)
- Appendix 1.pdf (4.8 MB)
Comment ID: PSLPA16/2820  Respondent: 8595649 / Paul Kassell  Agent:

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

The scale of growth is excessive, the SHMA has not been scrutinised by the Councillors and the details of the calculation is not in the public domain. With the recent referendum result and uncertainty of forecasts of leading economists this growth is not justified.

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

Attached documents:

Comment ID: PSLPA16/4257  Respondent: 8596673 / Peta Malthouse  Agent:

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

ANNEX A

GBC Transport

LRN9 - LRN 13 and LRN 18 - LRN 19, improvements to the A323 and to Westwood Lane are insufficient and delivery is too late. Westwood Lane are C and D roads respectively where traffic is already very busy as the roads are used in the alternative to the A331 to gain access to the A3 and M3 and Guildford. There is no means of improving the hump backed bridge over the railway in Glaziers Lane or the single laned squint rail bridge over Westwood Lane which is height restricted.

LRN21, a bridge replacement for the level crossing at Ash is welcome but all this will do is pass on traffic holdups to the next pinch point.

In addition to the AUE and PRB, a Super Garrison in Aldershot is being planned. What will the effect of this be on Local Roads in the west of Guildford?

Hot spots on the A323 may be improved, but the congestion will just move on to the next hold-up, be it a car turning right or stopping bus. Large queues will form at peak time at junctions, in particular the roundabout at the junction of the A323 and the B3411 and the traffic lights at the junction of the A323 and the A324. The A323 is a direct road from the AUE into Guildford.

ANNEX B

The flawed nature of the Settlement Hierarchy and Settlement Profiles in respect of Wider Normandy

Wider Normandy is not a village with a centre, but is a collection of the following hamlets; Normandy, Flexford, Christmas Pie, Willey Green, Wyke and the eastern side of Pinewoods, a ribbon development along the A323, the western side being in Ash. Strictly speaking Flexford and Christmas Pie are one settlement, though residents of Christmas Pie think of themselves as separate.
After reading the Settlement Hierarchy and Settlement Profiles documents it is clear to me that Guilford Borough Council (GBC) suffers from confusion between Wider Normandy and Normandy. Wyke is mentioned once and Willey Green and Pinewoods not at all, even to be rejected as being too loose-knit or too small. The populations and amenities of Willey Green, Wyke and Pinewoods are therefore not included in either document. In 2011 Wider Normandy had a population of 2,981. The populations mentioned in these documents are Normandy 585 and Flexford 1,199, a total of 1,784, leaving 1,197 people unaccounted for, over a third of the population of Wider Normandy.

The Settlement Hierarchy

The Settlement Hierarchy document starts with the bold statement “The settlement hierarchy study is a key part of our evidence base for the new Local Plan. ... This document will enable us to have a better understanding of the roles of each of our settlements”. I don't think that the document shows any understanding of Wider Normandy or its settlements.

It is claimed that evidence gathering has identified that Flexford and Normandy would benefit from future development and access to key services for local residents. Where is this evidence?

I am not aware of demand for more services in Normandy, though there are some residents of Normandy who would like a shop for when they run out of milk or bread and to have a chat with the shopkeeper, particularly the chat. (When the Post Office closed, older residents would come to the Surgery and chat to the receptionist. The Church then started Tuesday teas for this group.) This, however, is not a viable business model. The Parish Council undertook a survey to assess demand for a shop, and found that demand was so weak that it would not be worthwhile. We had food shops and pubs in Wider Normandy, but they closed for lack of business. We still have bars in the British Legion and the Cricket Club. We have a farm shop which sells mainly meat, but also milk, fruit and vegetables, and a small range of organic groceries. It opens Weds - Sat and is well used. The Therapy Garden sell their produce and plants on Tuesday Wednesday and Thursday and again this is well used.

The population of Wider Normandy is sufficient to support a pub, there used to be six 15 years ago when the population was less than it is today, and a convenience store, but pubs and local shops are in decline all over the country as living patterns change. The ones we had in Normandy have closed.

Since Fast Broadband arrived two years ago residents increasingly shop online. Sainsbury and Tesco delivery vans buzz round the hamlets, and I have seen the Post van stacked high with Amazon parcels at Christmas. I shop online; my friends in Normandy all shop online. Online shopping and banking is the most sustainable for villages. Local shops will be less sustainable.

The Normandy Community Bus makes three trips a week to the supermarkets for residents who need transport. There is a convenience store in western Pinewoods, and a pub. The milkman delivers a range of groceries.

I am at a loss as to how the current residents of Normandy and Flexford will benefit from this plan, or in what way Normandy and Flexford will be more sustainable. The only thing on offer seem to be shops, which we do not need. The plan only brings disbenefits; loss of green open space, increased traffic, years of noise and disruption during building, pressure on existing services and a loss of identity, as the proposed development will double the size of Wider Normandy. The Settlement Profiles states "In terms of how well the villages work as a community, the settlement scores 35 out of 40, the highest scoring out of all the villages". Will this community spirit still exist if this plan is implemented? As for the evidence gathering, please see below.

The Settlement Profiles

These are the errors and omissions.

- P47 Wider Normandy is confused with Normandy Settlement. The document says

“Normandy Parish Council considers Flexford and Normandy to be one village. We have therefore assessed and scored it on this basis.” Normandy Parish Council considers Flexford and Normandy to be two settlements in the parish. Scoring Normandy and Flexford together is therefore incorrect. The nature of Normandy was explained in the last consultation, but the error has persisted. Why?
• Only Normandy and Flexford are considered. Wyke, Pinewoods and Willey Green are ignored. Wyke has a
curch, Wyke Infant and Primary Schools and a good bus service. Willey Green has a good bus service and 6
rural businesses, eastern Pinewoods has an Indian restaurant, a Chinese takeaway and a good bus service.
• On page 47 it states that Normandy has two schools. The schools are in Wyke.
• On page 47 it states in respect of Flexford "There is no central meeting place such as a village green within the
village" which is true if Flexford is considered to be separate from Normandy, but untrue of they are considered
as one, as in this document. Manor Fruit Farm, Normandy, where the Village Hall is situated, is a de facto
village green. This is where the May and August Fetes, the 5th November Bonfire and Dog Shows are held.
Manor Fruit Farm has a play area for children and an outdoor gym. The Doctors Surgery is also located here,
and Normandy Therapy Garden.
• On page 48 it claims that Wanborough station has direct access to London. There is a change at Guildford
• On page 49 it states that there is a Site of Nature Conservation Interest (SNCI) to the North of Normandy. There
are 8 SNCIs in Normandy; Normandy Pond SNCI, Normandy Common SNCI, Wanborough and Normandy
Woods SNCI, Little Flexford SNCI, Wyke School SNCI, Wyke Churchyard SNCI, Withybed Copse and Henley
Park Fields SNCI and part of Broadstreet Common and Backside Common SNCI.
• On page 50, it is stated that Normandy has two Grade II listed buildings. Normandy has nine, Longer End Farm,
Longerend Cottage, Hunts Hill House, Manor House, Normandy Hill Cottage, Normandy Hill Farmhouse,
Glaziers, and Halsey Cottage, not two (Or does GBC think that Normandy stops at the A323?). In all, Wider
Normandy has 22 Grade II listed buildings.
• Flexford has a Scheduled Ancient Monument, a Romano-Celtic temple complex 385m west of Long Common.
List no: 1019641 which lies between Flexford and Wanborough. This not mentioned,
• On page 50 Normandy and Flexford are again considered separately, instead of together, as stated.

ANNEX C

This development is not driven by objectively assessed need as required by the NPPF, but by commercial considerations
and GBC's willingness to build on the Green Belt, rather than more difficult options within Guildford itself. The NPPF
places priority on Evidence Based planning. This plan has been put forward by Taylor Wimpey, who have options to buy
this land and therefore wish to develop it for commercial reasons, as developers quite rightly do. However, to get over the
inconvenience of it being Green Belt land, they have offered a free school in return for permission to build 1,100 houses.

Once the offer of a free school in Normandy/Flexford was made, and only then, GBC started to talk about a lack of
school places in the West of the Borough, based on need from Blackwell Farm, Ash and the Normandy/Flexford
development. Normandy currently has about 20 children.

An amendment was passed at the GBC full Council meeting on 24th May which stated that if the need for a school was
not proven, then there should be no development in Normandy/Flexford. It therefore follows that significant need for
secondary school places from outside of Normandy should be shown, as children from the new development in
Normandy/Flexford cannot be used to justify the school. At the GBC meeting on the 24th May I heard one councillor
say "but if the school fails where will we build all those houses? " The houses are the driver and the school is the enabler
for building on the Green Belt.

The Infrastructure required is not there

Transport

Roads

The A323, the road that passes through Normandy, is nearing capacity. Travelling eastwards, to turn into Bailes Lane
requires a right turn on a sharp left hand bend. Sometimes it can be a long wait, and traffic builds up. Other junctions in
Normandy are similar. The traffic lights at the junction of the A324 and A323 have been identified as a bottleneck in the
Surrey County Council Strategic Highways Assessment Report (SHAR) 4.9.1, as has the roundabout at the junction of
the A323/B341.
Queues also build up on the A323 in Normandy on Mondays, when the rubbish truck collects. There are few bus bays, so traffic queues behind buses. There are no cycle lanes, which means that traffic has to slow and wait to pass cyclists on this narrow road, which has many bends as it passes through Worplesdon.

Westwood Lane and Glaziers Lane form the borders of the Normandy/Flexford Site. Westwood Lane, C16, is a narrow country lane on which two entrances into the Normandy/Flexford site are planned. Queues will form while cars and fairground equipment wait to turn right into the development. Glaziers Lane, D60, where a single entrance is planned is also narrow. These rural lanes have developed over time to allow people to travel between the hamlets of Wider Normandy. They were never meant for, nor are they suitable for, any weight of traffic.

Queues will build at the junction of Westwood Lane, the A323 and School Lane, where Wyke Primary School is located close to the junction. The SHAR table 4.3 anticipates that traffic on Westwood Lane will increase by 1284%. Anticipated improvements to Westwood Lane are not due until 2021-2026. The main area of concern has to be that of traffic. The difficulties arising from the use of the A3, B3000,A323,A322 etc. have all been referred to however the proposal is that the A46 land should hold an additional 1100 homes would generate over 2000 car journeys at peak times.

The exit onto the main roads are via Westwood Lane/A323, Glaziers Lane/A323 and neither of those junctions could be widened or improved. At Westwood Lane the added difficulty is the access for parents to Wyke School, who park along Westwood Lane and cross the busy A323. SCC are presently trying to employ a Lollypop lady but have so far been unsuccessful. The safety for the children at that junction is paramount.

At Glaziers Lane/A323 junction the problem is width of the road combined with flood damage and concerns re subsidence. The road is not capable of widening due to the properties on either side of the road.

So far as the exit onto the Hogs Back is concerned again the junction is sited on an ANLV (soon to be AONB) and it is highly unlikely the junction can be improved. It is also subject to frost and ice making the road impassable at times. People who live in Normandy need SUVs if they are not to be cut off.

Improvements to the junction at Puttenham Hill, if confirmed, will take place between 2021 and 2026.

It can be seen that traffic from developments is already preceding improvements to roads. Moreover, the improvements to the A323 and the A31 are anticipated, not confirmed. Given the nature of the A323, it is difficult to see how it can be turned into a major link between Aldershot, Ash and Guildford.

**Rail**

The Normandy/Flexford site is considered sustainable because it is next to Wanborough station. Children from Ash attending the school and commuters to Guildford are expected to use the train. Wanborough is a small rural station, unmanned, with a platform suitable for trains with 4 carriages or less. There are trains to Guildford and Aldershot half hourly, and an hourly service to Reading, which stops at Farnborough. Commuters wishing to travel to London have to change at Guildford onto a service which is already crowded at peak times.

To find out availability on peak hour services I went to Wanborough Station on Monday 6th June between 7:30am and 8:30am. Trains to Reading and Aldershot were quite empty. The 07:48 to Guildford was quite full, but some seats were available. With 40 people standing per carriage, that train could probably have taken 200 passengers. The 08:18 was slightly less crowded. With full standing, this train could probably have taken another 300 passengers. That is 500 spaces on peak hour services for a development with a population of over 2,500 people. Even these few spaces are likely to be unavailable, owing the AUE. The train, a 17 minute journey from Aldershot to Guildford, is likely to be a popular option for AUE residents working in Guildford as it is a 20 minute walk or 10 minute cycle to the station, an overall journey time of 37 minutes.

GBC is in talks with the Train Operating Companies and Network Rail, but any improvements to the service are aspirational

**Cycling**
Policy A46 mentions an off-site cycle network to Wanborough station. It is not clear where this proposed cycle network would be. There is no space in Glaziers or Westwood Lane, closest to the site, or on the A323. Policy A46 also mentions an off-site cycle network to the Christmas Pie Trail (a rural track), which would lead to key destinations, unspecified.

**Heritage Assets**

it is a core principle of the NPPF to conserve heritage assets so that they can be enjoyed for their contribution to the quality of life of this and future generations.

There are seven Grade II listed buildings and one Grade II listed tomb adjoining or close to, this site. The houses are: Westwood Place, Buckhurst, Great Westwood, Halsey's Cottage and Glaziers. The other buildings are: Great Westwood Barn and St Mary's Church. The tomb is the Pirbright Tomb.

**Glaziers**

Glaziers, a lovely timber framed 16th century cottage, the Glaziers of Glaziers Lane, borders the site. GBC's own plan, according to the Sustainability Scoping Study, is that a site is red for development if an historic house is within 25m. Glaziers is within 25m of the site.

I attach a map showing where these properties are in relation to A46

**The Thames Basin Heaths Special Protection Area (SPA)**

Policy P5 of the GBC Plan states that 8ha should be set aside for every 1,000 residents. GBC also estimates an average of 2.4 people per dwelling. As this site proposes to build 1,100 homes, 2,640 people, the SANG should be at least 21ha.

**Degradation of Ancient Woodland and Ancient Trees and loss of Biodiversity**

Part of this site was originally parkland, laid out with oaks, many of which remain, belonging to Westwood Place. Some oaks are on the Ancient Trees Inventory and are more than 5m in circumference. They are at risk of damage from children, pets, pollution and building work.

There is ancient woodland both on the site and adjoining it. Both will be degraded by cat predation. The woodland on site will be further damaged by children and pollution.

**Flooding**

Wider Normandy is prone to flooding in all but the driest months, as it is situated in a valley with Ash Ranges to the North and the Hog's Back to the South. As the soil is mostly clay, the drainage is poor. A number of small streams swell and burst their banks in wet weather. There are springs on both the slopes of Ash Ranges and the Hog's Back. The water from these springs, together with surface water, collect in Wider Normandy to form the infant Hoe Stream. The Hoe then passes through Woking to join the River Wey.

The Hoe is notorious for flooding. Woking Borough Council (WBC) and the Environment Agency have worked together to alleviate flooding from the Hoe. As part of the mitigation project, SCC have designed the Hoe Valley Path which follows the Hoe Stream. It is managed by WBC and is designated as an SNCI because of its varied habitats.

Any flood mitigation should therefore be of the greatest sensitivity, in order to protect the Hoe and to avoid flooding other areas of Wider Normandy.

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

**Attached documents:**
Comment ID: PSLPA16/574  Respondent: 8597761 / Mrs Pippa Fleming  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

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

Attached documents:

Comment ID: PSLPA16/1376  Respondent: 8597825 / Mr P J Colborne-Baber  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The Housing Need. I do not believe that the planned provision for housing over the next 20 years needs to be anything like the figures proposed. Much work has been done on this subject by many people and I was shown a report at an Open Day briefing at the West Horsley Village Hall on the 9 July that supports how most of us feel and makes the need for such numbers unproven.

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

Attached documents:

Comment ID: PSLPA16/3824  Respondent: 8598561 / Sarah Belton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 a whole, on grounds that the Borough has failed to provide sound evidence of need for much of the development. In just ten minutes reviewing plan documents, I found a consultant report (in the Traveller Accommodation Assessment) dated as having been undertaken in June-July 2012 by Mill Field Services, whom I then discovered had been dissolved in January 2011 (according to the Companies House website). How many other errors or untruths are in the plan?

I believe the Local Plan 2016 is deeply flawed; lacks adequate, unbiased research and evidence of need; lacks infrastructure improvement already needed without there being any further development; and I believe is being rushed through to serve some hidden agenda. It must be properly reviewed under legal requirements using Regulation 19.

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

Attached documents:

Comment ID: PSLPA16/1860  Respondent: 8599201 / Richard D Jarvis  Agent:
2. The Objectively Assessed Need for housing is too high, and the SHMA from which it is obtained is flawed. The proposed large developments on greenfield sites should be smaller and designed to suit the landscape and infrastructure of the area, while respecting the Green Belt. Please have a rethink before taking this plan forward.

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

Attached documents:

3. The proposal to increase retail space by 40% in the town centre is too large, and should revised, taking into account current trends in retailing.

4. The majority of these comments concern the transport evidence which was produced very late, being published on the day this consultation started, 6 June 2016. While the evidence is useful, it is incomplete and has raised lots of questions that have yet to be answered. There is an infrastructure deficit in Guildford and in Surrey, as the report on the Surrey Infrastructure Study explains, and the cost of meeting needs over the next 15 years is going to be a major challenge.

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

Attached documents:

5. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The Plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

6. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by SCC at the request of GBC. The analysis was carried out using SINTRAM, SCC’s strategic traffic model. The model has been revalidated, though this was not stated in the SHAR. The latest version contains less traffic than the previous one. This makes it infeasible to compare results with those or the earlier studies for Guildford, namely the Preliminary Growth Scenarios Transport Assessment and the Options Growth Scenarios Transport Assessment.

7. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions in the borough from 2009 to date. It represents today’s circumstances, with the addition of growth in traffic
to 2031 outside the borough and in Waverley in line with their plan. The results for this scenario correspond to the current unsatisfactory traffic conditions in peak periods.

8. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the Plan. The Scenario 5 results show that there will be widespread congestion in the morning peak hour across the network in 2031. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11 will be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHAR results provide evidence that congestion will be worse in 2031 than it is today on much of the network.

9. It is the case, as stated in the report that the traffic modelling does not take into account the potential for increased use of other modes but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow additional ‘park and ride’, which would improve matters in the town centre.

10. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3), and those in Tables 4.3 and 4.4 with levels of service E and F that will not benefit from the improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario 5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing in peak periods’.

11. The cumulative effect of the additional traffic generated by the developments in the Plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So I do not accept the conclusion that the developments would have ‘an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’.

12. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major improvement scheme being studied by Highways England for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore there will be a period in which the existing A3 will have to carry additional traffic associated with those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR:

- Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey Research Park and the RSCH through the development (para 4.7.3)
- Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/ B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8)
- Wisley Airfield– traffic will increase on minor roads to gain access to the A3 (N and S bound) and to other routes (para 4.7.11). The development will add more traffic to the A3. The Burntcommon slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)
- Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Lane, B3000 junction, but increasing at the Puttenham Hill/Millbrook junction
- Ash – development in Ash is not specifically addressed, but there are large increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction)
13. The town centre is extremely important for all residents and for the economy of the town. The Plan provides no policy statement relating to transport in the centre, which means that there is no vision set out, in spite of the work that has been carried out for GBC over the past two years. The SHAR has very little to say about the town centre. The model results forecast severe congestion on the approaches to the town centre including A281 Millbrook, the A31 Farnham Road, and A322 Woodbridge Road for example. There are no highway mitigation measures in the PSLP for the centre. In the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined in the SHAR, but all traffic would be severely affected. That using the A281 to access the west of the urban area, as one example, would face having to find alternative routes. The PSLP does include a new park and ride facility at Gosden Hill and the Sustainable Movement Corridor, which are discussed below.

14. The PSLP does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence provided shows that this will not happen.

15. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the PSLP. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic (47% more than in 2009), to which they are unsuited

Park and Ride

16. There is one ‘park and ride’ project in the Infrastructure Development Plan which is a new facility at Gosden Hill Farm. This is to be delivered by the developer of the site and the Transport Topic paper states that the intention is that it will operate without any public funding with 500-700 spaces. It is expected that the site will be use by drivers on the A3 southbound heading into Guildford town centre (Transport Topic Paper para 5.60). It is not evident that this ‘mitigates the traffic impact of the Gosden Hill Farm site’ (PLSP App C P&R1), though of course there may be some residents of the new development who may choose to use the P&R bus service. This facility is not related to the proposed new Guildford East Station at Merrow.

17. There is an absence of any park and ride proposal east of the town centre, although the volume of traffic suggests that a facility warrants consideration.

Sustainable Movement Corridor

18. This is an ambitious concept. Policy I3 in the Plan states that the SMC ‘will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists’. It will link the new developments in the west to those in the east via the town centre. It is estimated to cost £70-90m, with funding coming from developers and the Local Growth Fund. The recognition of the importance of sustainable travel is welcome. Connecting new developments to the town centre, as in the case of SMC1 and SMC2, is sensible. The case for a ‘corridor’ has not been demonstrated.

19. The latest information on the project has been supplied in a paper ‘Progress Update on the SMC Scheme’ published by GBC on 6 June 2016. This explains that studies have been carried out for sections 1-5 of the proposed route, and further work is needed. The SMC will use existing roads for the majority of its length, so this means that it will affect the allocation of carriageway between road users. This will be challenging because the road width on several sections will limit what can be achieved without a major impact on other traffic. Two design formats have been identified, ‘type 1’ involving separate lanes for the SMC, and ‘type 2’ in which bus priority measures are introduced at ‘congestion sections and interchanges’. The majority of the route is likely to be ‘type 2’ according to Table 1 of the Progress Update.
20. The Plan states, in para 4.6.24, that ‘journeys will be rapid and reliable by bus and safe and direct on foot and by bike’. The ability to deliver rapid bus services in peak periods has not been demonstrated. There has been no quantification of the potential demand to use the SMC. Securing funding from the Local Growth Fund will require an economic justification.

Bus Transport

21. There are two projects in the Plan relating to buses. The first is labelled ‘New Guildford town centre bus facilities’. This is essential and the absence of a site for a bus station in the Plan is a serious weakness. Providing a focus for town centre bus services and the SMC surely should be a key feature of town centre planning. The improvement of bus connections to the station is also needed.

22. The second project is for bus/rail interchange at Effingham Junction station (or Horsley) is desirable if the Wisley Airfield development proceeds...

Active Modes

23. The schemes listed are welcomed.

Rail

24. There six projects listed in the Plan of which four will be delivered by Network Rail as part of their investment programme. The other two are the new stations, Guildford East and West, which will increase rail access to development sites, and the hospital in case of the West station, and are to be welcomed for that reason.

25. The Plan does not deal with the fact that the Portsmouth/London main line is extremely busy in peak periods. Commuters from Guildford to London frequently have to stand, and this is in spite of longer trains having been introduced. Capacity is limited in the area between Surbiton and Waterloo and this is the focus of Network Rail investment (project NR5) that is scheduled to start in 2029. The growth proposed in the Plan for Guildford will undoubtedly mean more people will want to commute, adding to pressure on the already congested services, in the years before the frequency of services can be increased, which is most of the Plan period.

Information Requests

26. I have requested additional information which it was not possible for GBC and SCC to provide in time for this submission. A list of the items requested is included in my response to Question 1 of the questionnaire, in line with the guidance provided in GBC’s email of 30th June 2016.

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

Attached documents:
Evidence fails to demonstrate the need for so much additional housing – except and unless the officers are planning for massive future inward migration.

Transport evidence is not fit for purpose. Moreover the proposed Local Plan does address past concerns, such as another river crossing and an improved central bus station.

The proposed Local Plan demonstrates reliance on creating many acres of new housing now to pay the bill for inadequate infrastructure plans, whilst ignoring the obvious consequences that large housing developments generate more traffic, air pollution, require more roads, more public transport, increasing demand for health and education services.

It must be observed that, since Guildford Borough Council is not responsible for paying for many of these extra services, it appears that the tenet of general social responsibility has been completely abandoned.

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

**Attached documents:**

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**Comment ID:** PSLPA16/2703  **Respondent:** 8601537 / Downsedge Residents' Association (Rosemary Morgan)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. The SHMA and the Calculation of the OAN (Objectively Assessed Need) for future Housing Numbers

The OAN figure of 693 homes per annum is not only double the figure in the previous, 2003 Local Plan (322 homes per annum), it is also based on flawed calculations within the SHMA report:

- by failing to correct for errors in the historical for international migration flows
- by failing to build a separate case for student housing OAN
- by failing to take into account the fact that the “affordability uplift of 321 homes per annum would not result in a noticeable improvement in affordability but simply in more people who can afford high prices moving to the area”
- and by failing to correctly estimate the number of homes required to support future job growth: even before the Brexit vote, evidence suggests that homes to support future jobs should be included in the demographic OAN

These flaws have been thoroughly exposed by a recent report carried out by Neil McDonald, of NMSS, and commissioned by Guildford Residents' Association. **NMSS have calculated a more realistic OAN of 510 homes per annum, and claims that if a separate student OAN were also calculated, this figure might even need to be reduced still further.**

We also agree with the findings of NMSS, that it is not enough to simply reduce the OAN in the light of the Brexit decision, but that the flaws in the method of calculation should also be taken into consideration.

2. The OAN figure should also be constrained by a number of factors before the final Housing Target is set:
DOWNSEDGE RA believes that, as well as being reduced to correct for errors (see above), the OAN figure should also be constrained by a number of factors (as per paragraph 14 of the NPFF) to reduce the overall Housing Target, namely:

- the lack of infrastructure (particularly transport infrastructure) affecting road travel and causing serious congestion, within the Borough
- the risk of flooding in a large number of key areas of the Borough
- the large amount of Green Belt land within Guildford Borough, which limits the amount of available land for development (see below)
- the fact that Guildford is both an historic town and a “gap town”, both of which reduce its ability to easily correct the infrastructure deficiencies

The National Planning Policy Framework (NPPF) allows for the Overall Housing Target to be reduced to take into account all of the following before arriving at the final figure:

- Protected wildlife area (e.g. Thames Basin Heath SPA)
- Landscape areas (e.g. Surrey Hills AONB)
- Green Belt
- Flood risk
- And significant infrastructure constraints

All of the above factors could be applied in Guildford Borough, and yet the GBC Housing Target has not been reduced by such constraints in the Submission Local Plan. We note that all other councils in Surrey, apart from Guildford, have applied constraints to reduce their overall housing figures and urge GBC to do the same.

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

Attached documents:
subject of this consultation. However, since Policy S2 is based on forecast population numbers which are unsound, I object to Policy S2.

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

Attached documents:

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Comment ID: PSLPA16/93  Respondent: 8602465 / Sallie Hair and Beauty (Ms Sallie Hone)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Lack of ANY evidence for the alleged housing need numbers

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

Attached documents:

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Comment ID: pslp173/687  Respondent: 8603201 / Guildford Allotments Society (Andrew Simmonds)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

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

I am responding on behalf of Guildford Allotments Society with regard to the content of the plan. We currently have sites in the Guildford urban area only, and I am concentrating my responses to this area.

Sites. We note that the plan, at pages 141-143, discusses sites in Guildford Town Centre, and the Guildford Urban Area. Guildford Town Centre has 1285 homes planned, with two sites in excess of 250 homes. Guildford Urban Area has circa 4100 homes planned, with 4 sites in excess of 250 homes. We note in particular that site A21, Aldershot Road Allotments, is scheduled for 0 homes; we are pleased to note that this site is not planned for housing, but is allocated for additional allotments.

Open Space, Sport and Recreation - we agree that allotments need to be local (para 4.2.3) but your definition of local appears to be within the ward. The more local they are, the more sustainable they become; people will walk if the site is close enough. This is particularly pertinent to the developments at Blackwells Farm, and Gosden Hill.

Stoughton and Worplesdon wards are reported as having a shortage of allotments, whilst Westborough has an overprovision; in practise, the main Westborough site (Aldershot Road) is very close to the boundary of these three wards, and serves all.

We note the inclusion of a national standard of 0.25 Ha per 1000 population (a figure we recognise and support) and that the current provision is 0.23Ha per 1000 population, leading to an undersupply of 2.99 Ha. We currently (as at 1.7.17) have a waiting list of 144 applicants for allotments; this would equate to about 3.72 Ha. This is reasonably close to your figure; a small waiting list is healthy.

We note too the inclusion of allotments in the SARP plans; but whilst there is a note in table 23 of on-site provision of allotments for sites of 250+ homes, there is no mention of allotments in other sites of 250+ homes in Guildford Town Centre or Guildford Urban Area. We believe that it is essential that they be included within the Blackwells Farm, and Gosden Hill developments; and whilst that intent would indicate two other sites in Guildford Town Centre should have allotments too, we recognise that may not be achievable in practise. There is a shortage of allotment provision in
Guildford Town Centre, and thus additional provision should be made in the Urban Area to compensate for this. Whilst Stoke Park would be an excellent location for additional plots logistically (as you suggest), being close to where our demand is highest, we recognise that in practical terms it may not be possible.

With regards to the SARP development, the timescale seems to have slipped. We are experiencing a degree of planning blight already, in that it is the only site we have with a few vacant plots, and no waiting list; people are not keen to take on a plot with limited future. We would welcome the plans to become better defined, and progress plans to relocate some tenants to alternative sites closer to their homes.

Finally, a request to note that in recent years houses have been built with smaller gardens than in earlier times, and more flats have been developed. These have lead to increasing numbers of applicants for allotments in recent years. This trend of smaller gardens is likely to continue. Thus the national standard of 0.25Ha (above) may need to increase; and hence allotment provision need to be increased. This is particularly pertinent to the developments at Blackwells Farm, and Gosden Hill.

We feel we have a good working relationship with GBC, and note that this version of the local plan has incorporated much of the consultation response of last year; we look forward to continuing to work together in a spirit of co-operation.

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

Attached documents:

Comment ID: PSLPA16/1810  Respondent: 8605921 / Roger Lindsay  Agent:  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

The huge number of houses proposed it is said is following government guidelines. Yet I read that a large part is due to GBC deciding to for an exaggerated growth. In my view we do not need more growth here, we need less and put the growth elsewhere where it is needed. This looks like a plan designed by builders.

I have great difficulty with any plan like this one which has no associated costing, especially to the taxpayer. Mention is made of major road construction. Who is paying? There are numerous other areas where one way or another infrastructure cost is implied. No idea is given and this cannot be right.

The same is true of timing. No information. Clearly there will be massive interruption, inconvenience, delays etc from a project even if as it must, spans years. This is not spelt out nor is it clear who pays.

While a document that appeared months ago cannot be expected to take account of any impact of e.g. "Brexit" there is no sign of tests of robustness to unexpected changes in circumstances, economic or other.

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

Attached documents:

Comment ID: PSLPA16/4280  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)  Agent:  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )
1. Introduction

CPRE Surrey Guildford District welcomes this opportunity to make this submission concerning the draft local plan. CPRE has the third largest county membership in the country and Guildford and Waverley are its two biggest CPRE Districts in Surrey. CPRE is an Advisory Board Member of the Surrey Hills AONB Partnership and also chairs the Surrey Aviation Group. On both a national and local scale, CPRE has had extensive experience over many years in shaping and interpreting planning policy.

1. Background to this Submission

CPRE is concerned at the uncertain background to this GBC consultation which has been characterised by a number of executive and officer changes and also overshadowed by the recent EU referendum with its as yet unpredictable political and economic outcome. It is not possible, for example, at this time to estimate what impact this might have on inward migration. We are dismayed about the inclusion in the draft Local Plan of so many Green Belt development sites which are considered necessary by GBC if they are to meet the unrealistic ‘Objectively Assessed Need’ (OAN) figure of 693 houses per annum (SHMA). What is required instead is a more careful consideration of the many widespread and serious constraints on development within the Borough, and the need to protect and enhance the countryside adjacent to and around the town of Guildford and its villages, rather than undermining this valued resource through the proposal of urban extensions and over large housing sites.

CPRE does not agree that this consultation should be made under Regulation 19 as a number of wholly new items, which we have indicated in this document, have not been consulted upon under Regulation 18. Additionally, many proposals for policy and development sites have not been able to be assessed fully for consultation as the necessary detail for them is absent. Furthermore, some of the ‘evidence’ in the Pegasus Report on the countryside has not been corrected, and has been used in a subjective quality assessment of the Green Belt to justify recommendations for changing boundaries that do not stand up to detailed examination. We have given an example of this in connection with the Blackwell Farm proposal (page 17).

CPRE has had to select only those sections of the draft Local Plan for comment which are primarily concerned with the countryside as the 6 week period for consultation is too short a time to deal with all the material available for study. We have therefore had to concentrate on those omissions and assumptions made about the borough that we consider need to be reviewed more completely in depth.

1. Fundamental Overall Objection

- Green Belt and AONB
It has been made clear by the Government that they remain committed to protection of the rural environment. When asked to comment on the National Planning Policy Framework, the Minister of State for Housing & Planning Brandon Lewis MP made the following declaration in a letter dated 10th June 2016 to Richard Knox-Johnston, Chairman of the London Green Belt Council:

“The Framework makes it clear that inappropriate development may be allowed only where very special circumstances exist and that Green Belt boundaries should be adjusted only in exceptional circumstances through the Local Plan process and with the support of Local people. We have repeatedly made clear that demand for housing alone will not change Green Belt boundaries.”

This clear policy statement is not reflected in the draft Guildford Local Plan which calls for housing development not only on a number of sites in the AONB and the AGLV but also encroaches on the Green Belt in a wide range of other locations. CPRE maintains that this is a misguided approach and renders the current proposal unsound. CPRE OBJECTION.

• Town Centre Capacity

CPRE believes that the draft Local Plan is also unsound because no complete proposal for the Town Centre or for the development of the urban area has been made available in time for this consultation. This is required so that a coherent assessment can be made of the priority given in terms of the extent and type of housing development proposed, its density and location. Town and countryside have to be considered in parallel. CPRE OBJECTION.

• Green Balance Review of Objectively Assessed Need (OAN)

CPRE Surrey has commissioned Green Balance to review and supply an independent commercial opinion on the validity of the OAN housing figure of 693 given in the GLH Hearn West Surrey Strategic Housing Market Assessment (SHMA) for Guildford, Waverley and Woking. Their report makes clear that they judge this document to be flawed and the OAN figure for Guildford to be too high. In view of the Green Balance evidence produced, this puts the credibility of the whole draft Local Plan in question. The over estimation of housing need effectively makes the draft Local Plan unsound. CPRE OBJECTION.

Instead of the OAN recommended in the SHMA of 693, an overall reduction is suggested for this figure of 212 which results in a revised OAN of 481. Other areas for further investigation as to the validity of the 693 figure have been suggested. The summary of reductions recommended for the OAN for all 3 districts covered are shown in Table 1 of the enclosed SHMA Review on page 4.

CPRE does not accept that the constraints relating to development in this draft Local Plan have been properly assessed or taken into account. If they were, the OAN would be radically reduced and we estimate that there would be no need to use Green Belt land. GBC has indicated that the OAN figure which GL Hearn has produced takes account of constraints but gives no explanation of how this has been done. This whole topic needs to be investigated further.
CPRE is also not in agreement with the emphasis given to retail sector expansion and office and warehouse development at Guildford at a time of changing conditions in the market-place and a need for more urban housing. CPRE believes that the focus of attention on building in the countryside has been caused by a too high OAN figure and a refusal to allocate sufficient priority to the supply of affordable housing and flats in the town because building development in this category has been sidelined rather than given the attention it requires. CPRE OBJECTION.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3027</th>
<th>Respondent: 8627009 / East Clandon Parish Council (Sibylla Tindale)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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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</tbody>
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I object that there has not been and demand that (a) there should be a significant challenge to the GBC scenario planning and (b) the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

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: PSLPA16/2368</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>

Comments on Guildford Borough Transport Strategy

The description of the current transport networks in Guildford is a good one, though it excludes the poor bus network present in Guildford as well as the pedestrian environment.

Whilst the improvements are nice to have, some of them are not in the control of GBC, such as rail and strategic road improvements. There is a need to better explain some of the improvements, such as “local traffic management and environmental schemes” what are these and would these be sufficient to mitigate the expected increase in traffic numbers. These schemes should have been identified in the iterative use of the strategic transport model to identify, maybe not the detail, but the level of magnitude that these schemes would be.

Looking at the indicative programme and costs, some of the costs seem to be an underestimate of the likely cost of the scheme and there is no indication on who would foot the bill. It is not sufficient for the developer’s to foot the bill as these schemes would be added to the cost of development, together with affordable housing etc, and would affect the viability of any development. There is no guarantee that the developers would end up paying for any highway scheme.

In conclusion, this strategy is very aspirational, with no guarantee for delivery.

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? ( )

Comments on Strategic Highway Assessment

This work was carried out by Surrey CC on behalf of GBC using their county wide traffic model. This model is widely used in Surrey and therefore I have no comments on the principles and objectives behind the model.

According to the report, Guildford is made up of 68 zones mainly concentrated in the town itself with larger zones representing the outlying areas. For a countrywide model this would be sufficient. However, to assess the impacts of the proposed draft Local Plan it would have been expected that the outlying zones are subdivided to better represent the population in the area, eg: Worplesdon is represented by 1 zone however there are 3 large villages (Wood Street, Fairlands and Jacobs Well) each of these having traffic on the road network in the peak periods. This is similar in the other outlying areas.

This being said, the assessment has been along acceptable lines, it would have been expected that the Base 2009 flows be included in this assessment for comparison purposes only. With reference to the 2009 flows in the model, these are some 7 years old and would normally be out of date. It would have been expected that an assessment should have been carried out to ensure that these flows were still relevant. This appears not to have been done. Although, looking at the DfT counts for the A322 and A323, the Annual Average Daily Flow (AADF) appears to have little or no growth from 2000. Sample checks have been made of the DfT traffic survey sites in Guildford and a similar pattern can be found. This would appear to suggest that the level of traffic at AADF level supports the use of 2009.

Information on Waverley development sites and the growth rates from the surrounding Boroughs should have been included. In addition Woking and Mole Valley development should have been identified for inclusion rather than using the general DfT growth rate

All growth rates sites and trip generation information should have been included in the report. This being said the total vehicles generated appear to be of the right order.

The vehicle trip distribution adopted for this assessment followed an acceptable methodology for this type of strategic assessment. As this is a strategic assessment of a local plan, and little detail is known, only the accesses to the strategic sites should have been included. This would enable a more accurate assessment of the traffic impacts of these sites and hence would better inform the infrastructure assessment. It is an iterative process. Little is known as to whether the proposed mitigations would be sufficient to cater for current, future or future with development flows.

The Level of Service assessment is an acceptable methodology in transport assessments and gives a comparative assessment between the 6 categories.

The conclusion indicates that there would not be a severe impact on the highway network in Guildford for the local plan quantum of development and the major highway improvements (Highways England). This may be true when looking at Guildford as a whole, however there are pockets of severe congestion problems now which would get far worse with development. As stated previously this should have been an iterative process which should have identified areas for further work and assessment.

On a final note, it appears that the draft Local Plan housing numbers need the Highways England improvements.

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

Attached documents:
**Comment ID:** PSLPA16/2370  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

**Comments on Topic Paper: Transport**

Whilst it is true that the government has committed to long term funding to support delivery of the Highways England Schemes, it is well known that as governments change, funding commitments can change, or there is a review of government spending. Therefore, it would be prudent not to base development plans just on these major schemes. Indeed the strategic transport assessment indicated that without these schemes the impact of the proposed development on the highway network would be far worse than the assessment concluded.

While more sustainable transport is always an acceptable ideal, the infrastructure for this transport has to be provided at an early stage of development and going to places people wish to go. Without this in place people will not be persuaded to get out of their cars and use sustainable transport. An example of this is that currently cyclists have to use the current road network, there is little space on these roads to provide cycle lanes. This implies that the whole picture has to be looked at.

The Reasoned Justification at paragraph 4.6.23 of the Proposed Submission Local Plan now states that:

“The Sustainable Movement Corridor will be implemented in sections during the plan period, largely on existing roads and with the urban extensions at Blackwell Farm, SARP and Gosden Hill Farm, and some sites in the town centre, required to make provision for the corridor.”

This is not acceptable as there is no guarantee that the route will ever be completed. The route should be built through Guildford first and then extended if and once development comes along.

Whilst rail and strategic road schemes are welcomed, these cannot be delivered by GBC and are in the control of other institutions who will have other pressures on the available capital and elsewhere on the network. Therefore while it is acceptable that they are included in the draft Local Plan, these should be caveated that these may or may not be delivered during the plan period and that these should not form the basis of development quantum.

Surrey County Council prepared the Options Growth Scenarios Transport Assessment Report (OGSTAR) (January 2014) for Guildford Borough Council in advance of the Regulation 18 public consultation in 2014. The report identified a number of highway “hotspots” relating to the various scenarios assessed. Whilst the baseline would be useful for the Reg19 consultation, the other scenarios should not be used for this. The Strategic Assessment report looked at the top 30 and this document only looks at the top 10

The document sets out where the sustainable corridor will be. The extent of the corridor and its purpose is acceptable, though the seven wards should have been named. However, parts of the corridor depend on delivery by developers. This could lead to holes in the corridor as developments come along at different times. This corridor should be delivered as a whole to serve existing residents. With extensions as and when new developments come on stream.

There is nothing in this document about supporting existing bus networks. Having a good public transport network could encourage existing car users out of their cars into buses. A good sustainable network would be required to ensure any expansion to meet the needs of new developments has a good foundation to build on.

The same can be said of cycle and pedestrian networks. If a good base network is not present then it would be difficult to build a sustainable network to meet development needs.

Before any new park and ride site is proposed, an in depth analysis of existing sites will need to be carried out. This, together with the users of car parks in the town centre would lead to a better understanding of whether or not a new site would be viable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
However, I have no confidence in the numbers in the SHMA because the basis on which they calculated has not been disclosed. The Council cannot expect the electorate to accept a figure that, without this disclosure, might as well be picked out of the air. I cannot understand why Mr Spooner has refused to publish the analysis behind the numbers so that people can at least have some confidence that the figure of new housing being used by GBC to inform their planning decisions is accurate. This failure to be transparent unfortunately can only serve to make people even more suspicious of the motives of the Council.

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

I strongly object to developments that have not taken into account the Transport June 2016 Policy Infrastructure as below and refer to the Surrey County Council West Clandon Village Safety Scheme Feasibility Report June 2007 which clearly states that the A247 through West Clandon is not a standard A road.

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

Guildford New Local Plan

Transport June 2016 Topic Paper

Policy Infrastructure and deliver

• Existing infrastructure problems must be solved before any more development is permitted
• Not clear where the funding for new infrastructure need will come from nor whom will provide it.
• Economic viability clause weakens policy, development should not be allowed if infrastructure cannot be provided.
• Existing road already inadequate or under pressure and would worsen with the planned development reducing quality of life, A247, Send,

Policy

• New rural development is car dependent and inadequate/unsafe cycle routes and footways resulting in more traffic accidents,
• Scale of proposed development is too much for local infrastructure/
• The A247 experiences a significant accident rate including many minor accidents associated with peak time traffic, off peak accidents associated with speeding, vehicles mounting the payment.

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

Attached documents:

Comment ID: PSLPA16/1320  Respondent: 8655233 / Kay Mackay  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:

Comment ID: PSLPA16/1323  Respondent: 8655233 / Kay Mackay  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

1. The “objectively assessed need” figure of 693 homes a year is too high.
2. A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
3. The current SHMA inflates the proposed housing figure due to
   - failure to correct for errors in the historical data for international migration flows,
   - issues with the way it considers students and affordability and
   - flaws in the method for estimating the number of homes needed to support job growth.

1. It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

**Attached documents:**

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**Comment ID:** PSLPA16/1261  **Respondent:** 8667713 / Victoria Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. The housing needs assessment is flawed in various respects and overstates housing In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider
constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump short term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:

Comment ID: PSLPA16/1264  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

23. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.

° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
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<th>Respondent: 8672161 / Simon Page</th>
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<td>Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing;</td>
<td>Transport evidence is not yet fit for use and major transport issues are unresolved eg another river crossing, a central bus facility;</td>
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<th>Respondent: 8686913 / John and Susan 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>1. I would have hoped more facts about how the Council arrived at the number of houses required would have been more constructive but the Council appears not to be willing to be honest and open.</td>
<td>I OBJECT to the 2016 Draft Local Plan. I urge you to withdraw it and stop trying to force new development against the wishes of local residents and in a lot of cases common sense.</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: PSLPA16/848</th>
<th>Respondent: 8687265 / Dagero Ltd (David Roberts)</th>
<th>Agent:</th>
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Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

In addition to the long list of objections I have already sent to you, I'd like to add one further objection to the so-called Objectively Assessed Number of 693 which the council has paid property developers G L Hearn to invent.

The two exhaustive studies attached, one by GGG Councillor David Reeve and the other by an independent expert commissioned by the non-political Guildford Residents Association, now suggest to me that a number around 400-500 dpa would be more realistic.

If the council stubbornly go on ignoring evidence such as this, the draft plan is bound to fail the soundness test when it goes to the planning inspector.

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

Attached documents:
- Guildford OAN Review.pdf (172 KB)
- GRA Report FINAL.pdf (1.6 MB)

Comment ID: PSLPA16/1032  Respondent: 8703585 / N J Axten  Agent: 

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

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

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

Attached documents:

Comment ID: PSLPA16/2745  Respondent: 8706625 / Hilary Barker  Agent: 

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 houses being proposed for Guildford in this Local Plan: The Housing number of 693 calculated by GL Hearn who represent councils wanting to build large numbers of houses and greedy developers, has been proven to be a gross miscalculation of our housing need and far too high. The SHMA calculations on how this number was reached have not been provided and we have been asking for two years. Nobody in the council can tell us and GBC are refusing to provide the details.

- In 2010 GBC fought for 322 which met the housing need then and it appears that nothing has changed.
- This number of 693 is exaggerated and massively over stated and contains errors.

Despite a great deal of new evidence being made available that would reduce the dwellings per annum, residents are having to use this draft figure which is not right as the “need” to utilise Green Belt for development is based on this figure and for no other reason.

- 693 new homes for Guildford is more than twice that of any other Surrey borough.
• Guildford will be increased by 25%
• Guildford needs no more than 500 new homes during the Plan period all of which can easily be accommodated on urban and brownfield land with good local services.

• If this many new homes are built around Guildford it will only attract more immigration into the borough as it is proven that immigration is largely responsible for the housing shortage.
• These new homes will be mostly “executive” homes selling for a high price and therefore this strategy will not dampen house prices.
• These houses will be snapped up by affluent families wanting to migrate out of London and commute to the City.
• Our train network is already overloaded
• Our roads are congested.
• Now we have Brexit and this may well change our forecast on immigration numbers again and numbers for the university in the years to come..

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

Attached documents:
It is interesting to note that G L Hearn on its website states "is increasing its work with the public sector providing a consultancy approach with a strong commercial aspect." One feels “strong commercial aspect” is the overriding aspect of the SHMA produced for Guildford Borough Council.

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

Attached documents:

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**Comment ID:** PSLPA16/3590  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough. It is too high because of:

- The critiques of the SHMA submitted by Councillor Reeve and the Guildford Residents’ Association. They provide compelling justification for materially reducing the proposed
- The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have ignored these factors

Moreover the Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough. This is over double the previous figure of 322 used in previous plans. The SHMA report methodology is apparently based on commercially confidential modelling assumptions that are not publicly available for checking or review. For such an important public decision, this runs counter to all democratic principles of accountability and is totally unacceptable

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

Attached documents:

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**Comment ID:** PSLPA16/1164  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.
2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider
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3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:

Comment ID: PSLPA16/1166  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:
**Comment ID:** PSLPA16/2223  **Respondent:** 8711489 / Malcolm Wych  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The SHMA as the mathematical model it is based on, from my perspective, house. The only certain thing about the assessment is that it is flawed, its pie in the sky waffle.

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

Attached documents:

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**Comment ID:** PSLPA16/2169  **Respondent:** 8715777 / John Sansom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

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

Attached documents:

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**Comment ID:** PSLPA16/4142  **Respondent:** 8717921 / Helen Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 SHMA is far too The calculation are not transparent and no one in the council appears to care [or have the intellect to realise that errors could and probably do exist]. There are AT LEAST three independent reports which are highly critical of the SHMA including those commissioned by the GRA, CPRE and the one done by Councillor Reeve. The West Surrey SHMA is completely unfit for purpose and as a core document in the draft local plan brings the soundness and legality of the plan completely into doubt. I have no confidence in the SHMA. I object to its inclusion in the evidence base.

- I object to the use of inferior, inadequate and subjective documents in the evidence

- In particular I object to the LAA, which is inconsistent in the extreme and incomplete, citing for example land considered for schools which has not been considered for housing despite being brownfield, in excess of 50ha and close to the [eg site at Newmarsh Farm East Horsley – clearly brownfield due to lack of enforcement]. It is also highly subjective and open to challenge.

- I object to the Borough Infrastructure Delivery Plan, which is incomplete, lacking in detail, not properly costed eg £5-£10 million or even worse £100-£250 million and relies on funding that is not allocated by central government and is more of a wish list than anything.
I object to the use of the Green Belt and Countryside Study in all its volumes and Why is it that some sites are excluded because they weren’t identified in the Green Belt and Countryside Study despite numerous volumes and addenda? Why is it that some sites may impact the TBHSPA when they are outside the 5km zone are excluded (nothing to do with the size of site) and some sites are inside and indeed outside the zone but included? (again not to do with the size of site). It just appears to be inconsistent and subjective – quite possibly a desk-based study which has not been verified or cross-checked. This is unacceptable.

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

Attached documents:

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Comment ID: PSLPA16/2799  Respondent: 8725697 / J A Ottey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I wish to object to the draft local plan, on the grounds that Guildford council have failed to disclose how they arrived at the number of 13,860 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: PSLPA16/969  Respondent: 8726529 / Eric Palmer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

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Comment ID: PSLPA16/2336  
Respondent: 8728161 / Judy Kennedy  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Appx C Guildford's SHMA and the ONA on which the housing development of the Local Plan is based. Evidence revealed in the document which has been published by David Reeve July 2016 would appear to undermine GBC's housing development plan and the plans to increase the population of Normandy by over 175%.

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

Attached documents:

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Comment ID: PSLPA16/4404  
Respondent: 8729217 / Karen Stevens  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Introduction

The 269 hectares of land on the west side of Guildford at Blackwell Farm serve each of the five purposes of Green Belt identified in the National Planning Policy Framework (NPPF). Development here would:

- result in urban sprawl
- cause settlements to merge.
- result in encroachment and loss of open countryside
- have an adverse impact on the setting and special character of Guildford,

Stopping development on Blackwell Farm would result in the University of Surrey investing in and regenerating land in its ownership and delivering its commitments following the 2003 boundary review (including 270 houses for key workers and releasing Hazel Farm), which would free up homes in town.

Despite this, the Green Belt and Countryside Study (GBCS) initially assessed land at Blackwell Farm as being “poor” against Green Belt purposes.
This appraisal resulted in the site being identified as a Potential Development Area in the Issues and Options consultation. If the land had been properly assessed at that stage then it wouldn’t have been put forward.

Following the Issues and Options Consultation, Save Hogs Back, alongside other residents and campaign groups, presented its concerns regarding inconsistencies and obvious flaws in the Study to the Guildford Borough Council (GBC) Scrutiny Committee.

Save Hogs Back produced a paper (dated March 2014, titled: “Commentary on Guildford Borough Green Belt and Countryside Study” to put down in writing concerns that had been tabled at a round table discussion with the Pegasus consultant as part of the scrutiny process.

Following the Scrutiny Committee meeting, Pegasus was asked to revisit parts of the study and as a result adjusted scores for different land parcels. A large number of concerns were not addressed - in particular why a large site such as that at Blackwell Farm was not considered as a single land parcel. Whilst we still have strong reservations about the Study and the methodology applied by Pegasus, revised scores would have meant that site H1 would have dropped out as a potential development area. However, if the study had considered H1 and H2 as a whole, then both of these would drop out.

This paper sets out again some the reservations that Save Hogs Back has with the GBCS methodology and application of this methodology.

It also sets out further information about how Blackwell Farm meets each Green Belt purpose.

**The GBCS study**

The GBCS prepared by Pegasus Planning Group (Pegasus) on behalf of GBC contains significant flaws in its methodology and in the application of this methodology. These flaws mean that sites H1 and H2 (collectively “the land at Blackwell Farm, Hogs Back”) should not have been identified as potential development areas (PDAs).

Furthermore, the GBCS does not then consider other factors that would influence whether land should be taken out of Green Belt:

- The GBCS suggests that it follows best practice as out-lined in the South West Regional Assembly (SWRA) Strategic Green Belt Review. The SWRA review recommends the “consideration of landscape character and environmental capacity to absorb development” when identifying areas where boundaries might be reviewed. We have been told by GBC that the Landscape Character Assessment 2007 hasn’t been considered within the Pegasus Study.
- The Environmental Capacity Analysis, which does form part of the study, is incomplete, contains errors and hasn’t been used in formulating recommendations for PDAs.
- The study has not taken into account the results of the 2003 boundary review, which resulted in the release of land at Manor Park and a decision which the University described would “reaffirm rather than undermine the permanence of Green Belt around Guildford”.

The conclusions of the study for H1 and H2 contain further errors and do not take account of GBC’s current policy towards Areas of Outstanding Natural Beauty (AONB) or the ability to create a revised boundary within the land parcel as defined in the NPPF.

It is hoped that GBC considers the issues raised in this paper, amends the findings of the GBCS study accordingly and removes land parcels H1 and H2 as PDAs from the local planning process.

**Commentary of approach adopted in the GBCS**

1. Pegasus described in Volume I of its report how its methodology for carrying out the GBCS had “emerged from best practice identified within previous Green Belt studies, with particular reference to the recommendations of the review by SWRA [South West Regional Assembly].”
2. It also recognised that “the methodology used within the Coventry Study most closely follows the recommendations of the SWRA Review in terms of the clarity of the report and the stages undertaken within the assessment.”

3. The methodology adopted by Pegasus has not followed best practice as set out in the SWRA report or adopted the rigour of the Coventry study. In particular:

- The SWRA report describes how the starting point for review is “to determine the relative importance of the five criteria [five Green Belt purposes] and identify a ranking of criteria...”. This stage of the analysis isn’t included in the GBCS report, which instead assumes that each of the four purposes of Green Belt it considers in the analysis are equally important to Guildford

- Pegasus has not created clear criteria for how scoring was assessed against each of the purposes of Green Belt, despite it recognising how “Fundamental to a sound methodology that provides robust, defendable [sic] conclusions about Green Belt release, is the clear and transparent identification of information used, and the scoring methods and thresholds applied to each stage of the assessment. These need to be objective where possible and consistently applied to each area under assessment to allow for direct comparisons of each area at each stage of the review.”

- The GBCS approach isn’t “able to make judgements on strength of purpose for Green Belt” as described in the SWRA report. The GBCS simply gives a 1 or a 0 against each purpose of Green Belt, but does not consider how effective a plot of land might be relative to another within each category.

- There appear to be anomalies in the methodology adopted by Pegasus - eg its interpretation of Purpose 2 (to prevent neighbouring towns merging into one another) and Purpose 3 (to assist in the safeguarding the countryside from encroachment), as well as its very narrow interpretation of Purpose 4 (to preserve the setting and special character of historic towns). These anomalies result in land being incorrectly assessed for its ability to fulfil the purposes of Green Belt. The approach adopted seems difficult to defend.

- There appear to be inconsistencies in the application of this methodology when looking at the analysis of land parcels across the borough.

1. The GBCS approach does not recognise that, whilst an area of land may fulfil just a single purpose of Green Belt, there may still be strong arguments for it to remain as Green Belt (an issue that is picked up in other reviews). For example, an area next to a town may solely have the purpose to prevent urban sprawl (to check the unrestricted sprawl of large built-up areas - NPPF Purpose 1); whereas, the purpose of Green Belt designation for a remote area in the countryside may be solely to retain the open character of that land (ie to assist in safeguarding the countryside from encroachment - NPPF Purpose 3). The SWRA states that “areas of Green Belt might only fulfil a single purpose and yet have no capacity to accommodate development, that is without undermining the very purpose of Green Belt itself.”

2. The GBCS study has ranked a plot of land based on how many purposes of Green Belt it achieves (regardless of how well the land actually meets each purpose and how important that purpose is considered to be).

3. It is interesting to contrast the approach taken by Pegasus with the one taken by Cambridge (cited as a robust example in the SWRA report). The Cam-bridge review considers that the overriding purpose of Green Belt for the city is to preserve its historic setting, which includes its existing settlement pat-tern. It then appraises the extent to which each land parcel achieves this purpose in more detail.

4. Further concern about the criteria for scoring each Green Belt purpose is discussed later in this report, when the scoring for the two land parcels H1 and H2 is re-assessed.

5. The SWRA report states that “weighting the purposes for the Green Belts so as to achieve a cumulative ranking does provide a rational basis for identifying areas where boundaries might be reviewed. However, this analysis should be considered in combination with the consideration of landscape character and environmental capacity to absorb development.” This simply has not been done.

Appraisal of Blackwell Farm

The initial appraisal of land parcels H1 and H2 scored only 1 against a possible 4 when assessed by Pegasus against the 4 purposes of Green Belt it considered.

An independent appraisal of H1 and H2, based on the methodology used by Leeds City Council, demonstrates that an area comprising of H1 and H2 com-bined contributes to each of the 4 Green Belt purposes (ref. Rob Burch, 2013)
It should also be noted that the nature of the land at Blackwell Farm means that it scores strongly against each of the Green Belt purposes - although the Pegasus methodology wasn’t able to take this into account.

A subsequent appraisal by Pegasus, scored H1 and H2 with a score of 3 and 2 against the purposes of Green Belt respectively.

It would seem reasonable to consider the entire land area in terms of its ability to meet the purposes of Green Belt. Applying the same rules adopted by Pegasus for this combined site would demonstrate it met all four purposes.

Green Belt Review (culminating 2003)
The appraisal of Green Belt on the west side of Guildford was undertaken over a long period and resulted in the movement of the Green Belt boundary to accommodate expansion of the University of Surrey onto Manor Farm. The “essential characteristics of Green Belts are their openness and their permanence” and the determination of a revised boundary that was then adopted in 2003 took this into account. The appraisal by Pegasus (conducted in 2009) failed to address this issue.

“Compartmentalisation and subdivision of land into separate land parcels”

There is concern as to why the land parcels H1 and H2 are treated separately - despite conclusion in the report that development of H2 would be linked to development of H1. They have also been grouped together within subsequent local planning documentation.

There is also concern that the original subdivision of parcels of land didn’t follow a more defined boundary along the western edge of H2 (“using physical features that are readily recognisable and likely to be permanent” - NPPF, para 85). It would seem more appropriate to choose a line of tarmac road as the boundary, which has a hedge alongside it, rather than a footpath which passes across a field.

This example suggests that initial site visits did not inform the sub-division of land parcels and a choice of a revised western boundary of H2 passing through the farm buildings and then passing along a line bordered by woodland would have been more appropriate. This would have resulted in a land parcel much closer in land area to H1 and consistent with others in the study.

Diagram to the right shows the extent of H2 if the boundary had been informed by site visits.

Note: Whilst we have indicated a revised boundary that would follow the methodology proposed (but not adopted) within the GBCS, the revised area for H2 does not indicate a land parcel that would be deemed acceptable as a PDA. It simply highlights that the pro-cess used by Pegasus to define boundaries and compartmentalise land parcels within the study was inadequate.

It would be interesting to see records and photographs from Pegasus to establish how they arrived at the decisions they did.

Modification to the boundary has no impact on the scores for H2 (which have been corrected to account for errors in the methodology and application of the methodology discussed later).

Green Belt Purpose 1 - to check the unrestricted sprawl of large built-up areas

The definition appears to be clear within the GBCS and the score for both H1 and H2, which is close to the existing Green Belt boundary around Guildford, is justifiable.

Westward development of Guildford along the Hogs Back

Over the last 100 years, extensive development on the west side of Guildford on the northern slopes of the Hogs Back has made a large impact on the character of this area from what was formerly farmland and parks. The planned low-density garden village “Onslow Garden Village” (now known as “Onslow Village”) on the site of the old Guild-ford Hunting Park was started in the 1920s. The building of the A3 Guildford and Godalming Bypass which opened to traffic in June 1934 effectively formed the western extent of this development for many years. [Mount Farm, on the higher slopes of the
Hogs Back above Onslow Village was separately acquired to protect the views of the ridge - which formed the southern bound to development.

Piecemeal development had taken place on the western side of the A3 following the gift of land to the UniS with the construction of the Royal Surrey Hospital and then the Holiday Inn hotel alongside the A3 on land that was leased by the University to help finance the construction of the low density Research Park development, which began in the 1980s on the lower slopes.

The Manor Park park campus and sports park was given permission in 2003, which was followed by the recently built surface car parks of the Onslow Park and Ride. This low density expansion of Guildford is bounded on the west by the ancient woodlands at Manor Copse, Strawberry Grove and Dean Bottom. The 90m contour also forms the extent of the Manor Park development which helps form a boundary to development and goes some way to protecting the rural views from the AONB and Blackwell Farm.

A further low-density expansion of Guildford leapfrogging the ancient woodland and rising above the 90m contour, as now proposed, would be an example of urban sprawl on a massive scale - rather than what is described as “urban extension” in the draft local plan.

**Green Belt Purpose 2 - to prevent neighbouring towns merging into one another**

The approach taken by the GBCS is to consider the merging of towns as well as settlements and this seems to be consistent with Green Belt reviews elsewhere. However, the analysis of coalescence of settlement patterns has sometimes been seen to be considered within Purpose 4 (in the way they provide the setting and special character of towns) or analysed as a separate purpose of Green Belt (eg Purpose 6).

The definition that Pegasus has adopted within its study and its criteria for scoring against this purpose seems muddled and unclear. Whilst it can be agreed that “Some areas of land contribute more effectively in maintaining separation than others, depending on the local environmental or site conditions, such as topography and tree cover”, it doesn’t follow that an open, expansive landscape “contributes less in terms of anti-coalescence (scoring 0), whereas a land parcel which forms a narrow gap between two settlements would have a significant anti-coalescence role (scoring 2)”. What really counts is whether building on this land would cause a bridge between these settlements causing them to merge.

A piece of land that (once developed) would result in the merging of communities should score a 1 regard-less of the open nature of the land or otherwise.

Land at H1 and H2 fulfils the purpose of preventing towns merging over the long term as the entire slopes of the northern face of the Hogs Back are under developmental pressure. Already a quarter of the 12km stretch between Farnham and Guildford is developed. The University’s plans would increase this to a third.

Land at Blackwell Farm also presents merging of in-dividual settlements. Development of land parcels H1 and H2 would bridge communities of Park Barn, the Research Park, Wood Street with settlements in Pinks Hill, Down Place in Compton, with the small settle-ment of farm cottages on Blackwell Farm, with the houses of Beechcroft Drive and Onslow Village and the new communities of students and key workers at Manor Park. The development also draws in the small settlement in Chalk Pit, which borders the development area and further development (as proposed by the University) would draw in the small community at Flexford.

**Green Belt Purpose 3 - to assist with safeguarding the countryside from encroachment**

Land parcels H1 and H2 fulfil the purpose of pre-venting encroachment onto open countryside. The land itself is open countryside and neighbouring land stretching along to Ash is open countryside. Whilst the GBCS argues that only land that has development may fulfil this purpose, it is clear from other Green Belt studies that this is not the case and that parcels that themselves are open countryside are ‘stronger’ in the way that they fulfil this purpose (see note 1).

Whilst concerns exist regarding the definition of encroachment used in the study, the presence of a small settlement at Down Place and also a small settlement comprising a few farm buildings and farm cottages at Blackwell Farm does mean
that this land should score a 1 according to the GBCS definition. [This was some-thing acknowledged by the Pegasus representative at the meeting of 04 March 2014.]

**Green Belt Purpose 4 - to preserve the setting and special character of historic towns**

The Pegasus analysis as to whether a piece of land fulfils the purpose of preserving the setting and character of historic towns seems overly simplistic by just focusing on conservation areas. A more comprehensive and holistic approach which considers a number of broader issues is needed to provide a robust answer to this question. The SWRA report, for example, notes that the Cambridge Green Belt review has “withstood the rigour of Examination in Public, and comprised comprehensive and transparent assessment”.

The following factors were considered in Cambridge (“Qualities that preserve the unique character of Cambridge, and/or maintain and enhance the quality of its setting”):

- Views towards the city,
- Topographical framework for Cambridge,
- Specific sites that enrich the setting,
- Physical links with Cambridge,
- Elements and features contributing to the character of the setting,
- Contribution to a strongly rural landscape setting, and
- Social or economic links with Cambridge.

Applying equivalent factors to Guildford would indicate that H1 and H2 strongly assist in preserving the setting and character of Guildford.

It is also worth noting that in Coventry it was also acknowledged that the Meriden Gap formed part of the character of the area. It is therefore appropriate that the Hogs Back could be considered in the same light as a purpose of Green belt could be to assist in preserving the setting and character of the Hogs Back.

Clearly Green Belt land on H1 and H2 fulfils this purpose also.

In the St Albans review (section 7.5.2.), the key network of parcels that preserves setting and special character is identified as being: “to the south, west and north of St Albans (GB23, 24B, 30, 37, 38 & 39), especially to preserve views to the Cathedral and Abbey Church of St Albans”. There are uninterrupted views across open farmland from Blackwell Farm to Guildford Cathedral.

**Green Belt Purpose 5 - assist in urban regeneration, by encouraging the recycling of derelict or other urban land**

The study has chosen not to take into account a consideration of the purpose of Green Belt to “assist in urban regeneration, by encouraging the recycling of derelict or other urban land”. This has been based on assumption that all land meets this objective in equal measures.

However, other Green Belt reviews have taken this into account and have highlighted parcels of land that, due to their location (eg proximity to an urban setting), size and the extent to which they’ve been subjected to developmental pressure, would score higher than other areas.

In this context, land parcels H1 and H2 would score highly as the Green Belt has already been moved back to accommodate growth of the University; the University has already put forward proposals to build on Blackwell Farm; and, in response, the Council is already looking at alternative ways that the University can help meet housing needs by developing and regenerating areas with existing permissions (eg better use of surface car parking, the development of more student accommodation and the redevelopment of Hazel Farm).

The Research Park was created as a low density development:

“The notion of a research park had first occurred to the Vice Chancellor Professor Anthony Kelly back in 1977... “I remember thinking, Guildford is an attractive place too, where people enjoy living, and it has good communications. And
we, the University, have land to spare. So why don’t we build a research park? - p48, UniS A History of Shaping the Future, 2011.

Unfortunately, 40 years later, Guildford is less attractive and there is less space to play around with and transport links are choked. The research park provides just 65,000 sqm of office space across 28.33 hectares. The University can easily increase this density six fold. The extract from the Estate Strategy shows that the University is planning to build up to 323,200 sqm across a smaller area of Manor Park 24.6 hectares. The resulting plot ratio would still be at the low end for a typical development in a major town like Guildford.

Guildford should make better use of its surface car parks across the borough.
The WWF’s new Living Planet Centre in Woking was built over existing surface car parks.
The University of Surrey has more than 17 Ha of surface car parks alone across its estate. At the same time, the University is seeking to develop new homes on Blackwell Farm on the Green Belt. Recommendation: All new buildings on the University estate should make provision for underground car parking so that land devoted to existing surface car parks can be used more effectively. This is an efficient strategy for removing surface car parks. The new development for the Vet School should incorporate these ideas.

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Rather than extending the outer edges of Guildford, GBC should make better use of its land near to the railway line. The idea for building over railway lines isn’t new either - the Metropolitan Line in London was built by cutting down to build the railway and covering it over for roads parks and buildings. Other more recent examples include prestigious projects like Broadgate in London and the 320m long tunnel in Gerrards Cross to create a Tesco supermarket over an existing railway cutting. A similar development in Guildford would provide city centre accommodation (and easy access to the station!). It would also enable pedestrian and vehicular flows across a railway line which helps to split the town and contributes to traffic woes.

The aerial photograph <see attachments> shows areas of surface car parks (in yellow) and areas of railway line (in green) in the centre of Guildford which could be redeveloped for mixed use, including offices, retail and housing. The natural slopes of the surrounding land down towards the railway line means that buildings could be built several storeys high without reaching the height of the existing neighbouring buildings alongside the railway. This gives an opportunity for the development to create a mixed use development at high densities, whilst blending in with the surroundings. A linear development could be extended incrementally along the railway as Guildford needs to grow in the future. In doing so, the development will help to regenerate the surrounding areas and would form a bridge which links the two sides of Guildford which has been divided by the railway line and helping access across the town.

“Young’s Back Chalk Ridge landscape should be conserved, in particular the open nature of the landscape which forms a backdrop to the surrounding rural areas and Guildford, the wide and far ranging views from the many viewpoints along the ridge line and the sparse settlement pattern of traditional style and local materials. The intact large scale geometric field pattern and hedgerow boundaries and hedgerow trees should be conserved while there is potential to enhance and reinforce some of the hedgerows.” - Guildford Landscape Character Assessment

**Environmental Capacity Analysis**

It is not clear how the environmental capacity analysis has been used in the GBCS or how it will be used in deciding where development is best placed when considering alternative parcels of land. The SWRA report makes it clear that ranking of land parcels against Green Belt purposes should be considered in combination with landscape character and environmental capacity.
The data presented in the environmental capacity analysis for H1 and H2 is not complete and is therefore not fit to assess whether development could take place on this site.

The analysis does not allow a comparison to be made between the environmental capacity of different land parcels.

The simplistic approach adopted by the GBCS towards environmental capacity should be compared with the approach undertaken by Coventry, which considered primary and secondary constraints, existing or proposed development, landscape assessment and connectivity to the urban area when comparing alter-native land parcels.

The Environmental Capacity Analysis tables for H1 and H2 provides only superficial information about the land parcels, for example information about the position of paths, bridleways and ancient woodland on the site is incomplete.

The analysis does not consider the impact on the AONB for the road and road junction that is planned for the site.

The analysis does not take into account the visual impact of street lighting which would be necessary at the large junction and which would be visible for miles around. One of the distinctive features of countryside is the dark night skies and development on H1 and H2 would have an impact on views from both sides of the A31 and across the Surrey Hills AONB.

The identification of priority species and ecological network should have been included in the analysis because they directly dictate restraints to development, so the following should have been included:

- Priority species (there are at least 4 at Blackwell Farm)
- Ancient hedgerows
- Ancient trees
- Single Payment, Entry Level Stewardship and Higher Level Stewardship measures
- Ponds and streams
- Biodiversity Action Plan Habitats
- Biodiversity Opportunity Areas
- Green/ecological infrastructure
- More (see box 4.1 p41 in DEFRA’s Guidance for Local Authorities

The analysis doesn’t include all the environmental criteria needed to make an informed decision, for example, quality of life capital should have been considered in the assessment as has been done in the Cambridge Green Belt Review and the Nottingham-Derby Green Belt Review. This would capture the recreational value of Blackwell Farm.

**Landscape Character Assessment**

The SWRA Strategic Green Belt Review describes how landscape character should have been included in the identification of areas for Green Belt review.

The Guildford Landscape Character Assessment says:

“The Hog’s Back Chalk Ridge landscape should be con-served, in particular the open nature of the landscape which forms a backdrop to the surrounding rural areas and Guildford, the wide and far ranging views from the many viewpoints along the ridge line and the sparse settlement pattern of traditional style and local materials. The intact large scale geometric field pattern and hedge-row boundaries and hedgerow trees should be conserved while there is potential to enhance and reinforce some of the hedgerows. The remnant areas of chalk grass-land should be conserved and opportunities taken to extend and link these isolated areas. Screening for the A31 should be carefully maintained to retain a balance between shielding views from below of moving vehicles while keeping important views out for those using the road. The restoration of links across the ridge should be explored.”

Landscape Character Assessment was not considered within the Pegasus study.

**Sustainability scores**
The sustainability score is very simplistic in its approach. It does not take account of a range of broader sustainability issues - such as traffic impact, loss of farmland etc.

**Commentary on conclusions of GBCS**

The conclusions regarding the land parcels at Blackwell Farm (H1 and H2) don’t stand up to scrutiny. The scoring should be 4 out of 4 (not 2/3 out of 4 as assessed).

Furthermore, whilst the GBCS does not seek to differentiate between land parcels (in terms of their ability to meet each purpose of Green Belt), the land parcels at Blackwell Farm serve each purpose of Green Belt strongly.

The study does not take into account existing GBC policy: “10.25 Development should not result in the loss of important views to and from the AONB” as described in the Local Plan.

The photograph above was taken across H1 from the AONB and there is ancient woodland at the bottom of the field. There is no opportunity for development which could meet GBC policy. It is therefore not clear how the Environmental Capacity analysis has fed into this study and the recommendations that have been made.

The conclusion states: “The Green Belt boundary could be realigned to exclude the sloping ground between the A3, Down Place and Manor Farm, with defensible boundaries located along hedgerows, tree belts and woodlands.” The photograph shows that this isn’t possible.

The conclusion for H2 seems to be linked with H1:

“the land is somewhat remote from highway infrastructure when compared with land parcel H1” and “Given this situation, it would be appropriate for land parcel H1 to come forward as a first phase with land parcel H2 providing an opportunity for further development in the longer term, allied to the initial phase of land parcel H1”.

Given that the dependency of H2 on H1 was highlighted in the GBCS findings, there appears to be a lack of thoroughness in its approach. Recognising this dependency, these parcels should have been looked at together as a combined land parcel and a revised score for the combined land parcel evaluated.

Comments regarding views to, and from, a large stretch of the Hogs Back (and therefore to and from the AONB) apply to land on H2. Development on H2 would be visible to vehicles as they drive along the Hogs Back. (NB development on the University’s Research Park is screened by ancient woodland at Strawberry Grove. Any development to the west of this woodland would be seen.) Long views to the AONB enjoyed from Pinks Hill would be lost - thereby breaching GBC’s existing policy 10.25.

**Going forward**

It is not clear how the GBCS is being used.

The approach to assessing each of the purposes of Green Belt in the GBCS appears simplistic and it isn’t always possible to follow the logic adopted.

The GBCS conclusion that it is possible to develop any part of area H1, whilst not building on the slopes of the AONB, but still providing a bound-ary that uses physical features as defined in the NPPF, is simply not possible. This causes concern that the site was not visited by the consultants or anyone checking its conclusions.

If a land parcel has scored 3 or 4 out of 4 under a revised assessment (such as the land at Blackwell Farm) then it would be reasonable to expect to see the PDA removed from consideration in the local planning exercise.

The existing Green Belt boundary coincides in with the historic boundary of Guildford’s Royal Park.

“The Park’s boundaries are still identifiable today
- However, the western boundary is most intere-st-ing, curving and kinking as it follows hedgerow, and passing through woodland with Manor Copse (shown as ‘The Parocke’ on the east, and Strawberry Grove on the west, following a path
along the west edge of the Research Park and Park Barn housing estate to Broad Street, with sections of banking still evident. Clearly the Park was created within the existing field and natural boundaries, and it is possible that the west boundary followed ancient field systems, which dictated its curvatures.”


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

Attached documents:
- GBCS Feedback Local Plan (4).pdf (2.3 MB)
- Re _ Access to Blackwell Farm.eml (30 KB)
- Fwd _ Blackwell access.eml (9 KB)
- EIR request - ID 3035.pdf (516 KB)
- Re _ Down Place junction [UNC].eml (24 KB)

Comment ID: PSLPA16/1614  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. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:
1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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 to the overstated and completely unsubstantiated "housing need" development of 13,860 dwellings

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

Attached documents:

Comment ID: PSLPA16/3902  Respondent: 8732353 / Simon Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to any removal of villages from the Green belt and to the disproportionate amount of development in one area of the borough and I object to the lack of any evidence for the alleged housing need numbers.

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

Attached documents:

Comment ID: PSLPA16/3739  Respondent: 8732993 / Michael Weber  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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- The current SHMA inflates the proposed housing figure due to
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- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:
There is also no evidence in the consultation document of provision for the large amount of additional infrastructure that will be required to support the vast population increase that the proposals will bring. Both from the additional housing developments proposed and the inevitable village sprawl resulting from relaxing planning restrictions. These considerations should be addressed as a priority before any future retrofit developments are even considered.

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 figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as to how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

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

Attached documents:

Comment ID: PSLPA16/1769  Respondent: 8743073 / Darrell Howard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

- No evidence has been provided to justify the need for 14,000 new houses to be built in the Borough. Guildford Borough Council have refused to release the data on which this housing need is based and sought to withhold it from wider scrutiny under the premise that it is the intellectual property of a third party and is commercially sensitive. If GBC genuinely believes this housing figure is accurate then they should have the confidence to release the data upon which the figure is based. Not doing so is cowardly, deceitful and only increases the general public’s distrust of politicians.

- The referendum result means the data used to derive the need for 14,000 new dwellings must be revisited. One of the assumptions behind whatever model has been used to arrive at a housing need of 14,000 dwellings must have been that the UK would remain in the European Union. Given the country has voted to leave the EU it must mean that any population growth or immigration forecast assumptions used are redundant and will continue to be so until such time as we get a better understanding of what leaving will actually mean vis-a-vis the principle of freedom of movement.

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

Attached documents:

Comment ID: PSLPA16/3411  Respondent: 8743137 / Ben Woodford  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at **4.5 times the rate of population increase during the period 2001 to 2011**. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the
green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For the West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

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

Attached documents:

Comment ID: PSLPA16/1091  Respondent: 8744161 / Michael Bridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

   • The “objectively assessed need” figure of 693 homes a year is too high.
   • A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   • The current SHMA inflates the proposed housing figure due to
     ◦ failure to correct for errors in the historical data for international migration flows,
     ◦ issues with the way it considers students and affordability and
     ◦ flaws in the method for estimating the number of homes needed to support job growth.
   • It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/1095  Respondent: 8744257 / Mary E Bridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/2209  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/367  Respondent: 8747169 / David Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: pslp173/547  Respondent: 8748801 / N J Norton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

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

Habitats Regulations Assessment 2017
I object to all references to “Appropriate Assessment” being replaced by reference to “HRA” (Habitats Regulations Assessment). Appropriate Assessment has a specific application in planning guidance and should be used appropriately in this document to avoid confusion now and in the future. I propose all references the HRA per site be replaced by the phrase “Appropriate Assessment”

2.5 Air Quality Impact Assessment
I object to this section of the HRA 2017 document. At no point is any evidence of actual measured levels of NOX or CO2
at the locations identified in Table 4: Location of Link Roads analysed within 200m of the Thames Basin Heaths SPA. There is total reliance on Surrey County Council Transport department modelling.

The modelled levels are then treated as if they are actual measurements in Table 5: The Critical Load for the Target Habitats of the Thames Basin Heaths SPA. This can form no rational measured basis of future assessment of policy failure or success. I propose that this section of the document should be rejected and can form no part of policy formation in relation to Appropriate Assessment of sites until actual monitoring data for NOX and CO2 deposition levels are presented in relation to the locations identified in Table 4.

3.3 Recreational pressure
I object to this section of the HRA 2017 document. In paragraphs 3.3.6 and 3.3.7 the authors make negative assertions regarding the validity of scientific studies of disturbance and predation without presenting contrasting evidence. Under these circumstances, such assertions are merely hearsay and can make no contribution to the veracity of the scientific evidence.

I propose paragraphs 3.3.6 and 3.3.7 are either withdrawn from the document or their assertions ignored. I object to paragraph 3.3.9. It fails to recognise and include reference to the Natural England follow-up study published in 2014 [Natural England Commissioned Report NECR136 Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA) First published 13 February 2014] that shows a 10% increase in visitor numbers to the Thames Basin Heaths SPA. I propose that paragraph 3.3.9 should be treated with caution unless and until it is revised to carry a reference to the 2014 published NE follow up study [Natural England Commissioned Report NECR136 Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA) First published 13 February 2014]. I object to paragraph 3.3.4 and its simple-minded reliance on Dept of Transport generic presentation of deposition of roadside pollutants Figure 2: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT). Once more illustrating a naive acceptance rather than carrying out actual roadside measurements at provable sampling points around the TBHSPA perimeter where roads such as the A322 run directly alongside the land in question. I propose that until such data from actual roadside measurement in the SPA is available paragraph 3.3.4 should be treated with caution.

4 HRA Screening of Policies within the Guildford Local Plan Strategy and Sites Submission Version from 2016
I object to the assessment of Policy H1 Homes for All as having no HRA implications in Table 7: HRA Screening of the Policies within Guildford Local Plan Strategy and Sites Submission Version for Effects on Thames Basin Heaths SPA. The whole local plan that is to provide homes for borough residents determines approximately 6,500 new homes will be built within the 400m-5km mitigation zone of TBHSPA. How can this be brushed aside simply on the basis that the Policy H1 makes no reference to a quantum of housing? I propose that this assessment of Policy H1 be disregarded.

9.4 SANG Provision Assessment
I object to the continued inclusion of “Policy A46: Land to the south of Normandy and north of Flexford” in para 9.4.6 p55. This site is no longer part of the Local Plan. I propose the removal of “Policy A46: Land to the south of Normandy and north of Flexford” from para 9.4.6

9.5 Summary of Recommendations
I object to the continued inclusion of “Policy A46: Land to the south of Normandy and north of Flexford” in Table 13: Table identifying recommendations relating to SANG provision I propose the removal of “Policy A46: Land to the south of Normandy and north of Flexford” from Table 13

11.4 Recommendations relating to SANG provision
I object to the continued inclusion of “Policy A46: Land to the south of Normandy and north of Flexford” in Table 16Summary of recommendations relating to SANG provision. I propose the removal of “Policy A46: Land to the south of Normandy and north of Flexford” from Table 16

12.2 Update April 2017 Modifications: SANG Assessment
I object to the content of Para 12.2.3. The wording demonstrates the council has no answer to Natural England’s outstanding question regarding how financial contributions provided in Policy P5: Thames Basin Heath SPA would be secured.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/1811  **Respondent:** 8749089 / Anthony Hatton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

We are clear that we do need a revised plan ready for implementation in the quickest possible time. However, we are deeply concerned with some of the basic flaws to date not least of which is that the SHMA is somewhat light weight and within that the impact of Student movement in our community has not been given the weight of consideration it requires. Additionally, and as identified above, we question the thinking concerning protection of the Green Belt and the characteristics of our Borough which make it eminently desirable to live in as well as the important considerations required to deal with transport traffic and general infrastructure now and into the future,

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

Attached documents:

**Comment ID:** PSLPA16/1738  **Respondent:** 8749121 / George Paton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Objections re evidence base especially Guildford and West Surrey Strategic Housing Market Assessments (SHMA)

Failure to disclose Justin Gardner demographic housing model

Failure to procure the SHMA on open and transparent terms in accordance with the Guildford Codes of Conduct

Objectively Assessed Housing Need (OAN) fails to meet the definition of objective because it cannot be replicated by third parties, because GBC has failed in its public duty to obtain a copy of the model and its assumptions and to test the assumptions for alternative scenarios

OAN

Paragraph 2.19 of the local plan states:

"The NPPF requires councils to identify the housing needs of their area and respond positively to wider opportunities for growth. The document instructs us to use our evidence base to ensure that our Local Plan meets the full, objectively assessed needs for market and affordable homes in the housing market area, as far as is consistent with the policies set out in the NPPF."

GBC has not explicitly set out the OAN in the Local Plan. Nor has it explicitly reconciled that OAN to the Housing Target. Instead it is implied that i) the Housing Target and the OAN are synonymous and ii) the Housing Target will diverge over time if constraints emerge which show that the OAN cannot be achieved. The figure of 693 houses per annum appears nowhere in the Local Plan.
This is not an open and transparent manner of proceeding. The OAN should be expressly set out and its consistency with the policies set out in the NPPF explicitly discussed and tested to arrive at a Housing Target. To imply that the OAN and the Housing Target are currently the same but may diverge over time is to set out a false and misleading prospectus. The public is entitled to know NOW what the constraints are. It is not satisfactory that the public should embark upon an open ended process during which constraints may or may not emerge. GBC was capable of completing Transport, Environment and Heritage studies before submitting a local plan but has not done so. The public consultation is therefore premature and the public is asked to form a view of a project that is still in course of construction. There are no grounds for trusting that GBC will gather the evidence impartially or undertake diligent and conscientious analysis in the future.

SHMA and OAN evidence basis is not sound

The NPPF requires a local planning authority to make estimates of its Objectively Assessed Housing Need (OAN). It further requires an authority to assess its Housing Target in relation to its OAN by taking into account constraints - such as environmental, transport and heritage constraints.

GBC commissioned GL Hearn to prepare a Strategic Housing Market Assessment for the borough. In July, 2014 I made a Freedom of Information request to obtain a copy of the demographic housing model which was the basis of the housing need identified in the SHMA. The sequence of events was as follows:

1. GL Hearn published their Guildford SHMA
2. July, 2014 I made a FOi request to GBC to see the housing projections model (attached)
3. GBC failed to respond. I complained to the Information commissioner. On 26 September GBC supplied a copy of the model - in which only values had been pasted into the cells and all of the formulae had been removed
4. I asked to see the formulae. I considered that the exclusion of the formulae was equivalent to redacting the model - which was wholly unjustified because it was a model for a public purpose and process required for public consultation.

On 2 October, 2014 GBC stated:

"As you are aware, the model was produced for Guildford Borough Council by a third party and is not held by the Council. The model is the intellectual property of that third party and is commercially sensitive. They do not want to make the model publicly available. On that basis, the information is exempt under the EIR and I am therefore upholding the decision to only provide the information that was originally supplied in the Council's response of 12 September." (see attached email)

- I asked GBC to procure the model- since it had paid for it responded that the model
was not held by GL Hearn either (!). A subconsultant, Justin Gardner Consulting (JGC) created the model. GBC argued that JGC had intellectual property in the model which justified it not disclosing the model. It showed no evidence that it had even asked JGC for the model.

- I appealed to the Information Commissioners' Office. It held, on the basis of discussions with GBC, that GBC did not hold the information.
- I appealed to the First Tier Tribunal on the basis that 'possession' is not limited to physical possession but must include ownership and contro I submitted that the Council paid for the model, that its contract stated that it owned the copyright and that therefore it had the right to demand to have the model. The case was heard in my absence. GBC made private submissions to the Tribunal which were not disclosed to me. The Tribunal found that 'on the balance of probabilities' GBC did not hold the information.

On 11 January, 2016 following publication of the West Surrey SHMA I subsequently made a Freedom of Information request to see the model supporting the West Surrey SHMA. I was informed that GBC did not hold it. It did not offer to supply even the redacted version of the Excel spreadsheet. I made similar requests to Waverley and Woking Borough Councils - which jointly commissioned the West Surrey SHMA. They each replied that they did not hold the information as the work was commissioned by Guildford.

In January, 2016 I set up a public petition on Change.org to request the information. The Petition reads:
"Councils must publicly disclose housing need calculations in Guildford and across England"

To date the petition has collected over 1,000 signatures. The list of signatories is attached. The comments made are also attached.

Justin Gardner Consulting's website is here:

http://www.justingardnerconsulting.co.uk/index.php?page=test-page

The links to the Information Commissioner's decision are here

It speaks volumes that as soon as Mr Spooner was alerted to the existence of the petition GBC changed its petition rules so that petitions organized via Change.org (which had previously been accepted) were deemed no longer acceptable.

I wrote to the Surrey Advertiser concerning the petition on 16 May drawing attention to

- The report of the House of Commons Committee on Local Plans
- The report of the Local Plan Expert Group
- The Planning Advisory Service's '10 Principles for Owning your Housing Number'

The Interim Director of Development of GBC later wrote a letter to the Surrey Advertiser to claim that GBC was 'entirely reasonable' in not supplying the information. He also claimed that I had asked for a copy of the algorithms which made the modelling tool work. I had not asked for such algorithms - only for the missing formulae in the Excel spreadsheet which had been deliberately omitted.

On 10 June I made a formal complaint to GBC concerning the factual inaccuracies in the Interim Director's letter to the Surrey Advertiser.

Implications and inferences

It is a travesty that a model upon which the housing need forecast for this borough for the next 15 years cannot be seen by the public. The model was commissioned for a public purpose by a public body using public money as part of a process which explicitly is subject to public consultation. How then can it not be disclosable? It is all the more puzzling because Justin Gardner's website stated that its model could be used by Council officials to change assumptions and look at different scenarios. Despite this GBC claims never to have received a copy. That claim is not credible - not least because it has been able to disclose the model in Excel formal without the formulae - which suggests that a) it holds a copy and whoever copied the model into Excel had the formulae.

The demographic projections for Guildford are known to contain anomalies caused, for example, by the presence of a university. This causes a bulge in the 18-23 age bracket. Ordinarily demographers project the growth of the population across time by moving the age cohorts forwards in time. A bulge in the 18-23 age range would imply that in ten year's time those people would be requiring additional housing. However, since these are university students - a very large proportion of whom do not originate in the borough - they are unlikely to cause a proportionate increase in demand for housing.

The housing projections imply a required growth in housing of some 20% of the housing stock in only 15 years. Unless this is broken down into the different components of demand it is impossible to challenge the projections except in the most general terms. The implication that GBC has no intention of opening itself up to scrutiny and debate is hard to escape.

There are two main drivers of the housing model: demographic change and economic growth. It is known that the raw ONS figures project a fall in the population of the borough if net international migration is excluded. It is known that the largest component of population growth is 'Unattributed Population change'. To embark on the greatest building boom in the history of the borough on the basis of statistics which are incomplete and unscrutinised is an abdication of responsibility. What is the Council for if not to scrutinize these figures?
The Scrutiny Cttee was persuaded not to scrutinize the SHMA on the basis of advice from Council Officials - including the Interim Director of Development. The Interim Director of Development, Mr Neil Taylor told the Scrutiny Committee on 15 March:

"The problem is that we cannot start tampering with the Objectively Assessed Need Evidence Base....The Objectively Assessed Need has already been signed off as an evidence base document. I don't think the SHMA is a matter for scrutiny. It's too late. And the opportunity is long, long gone."

He later told the committee:

"The Objectively Assessed need (OAN), the Housing Target, the local plan the allocation ... the whole lot is subject to market forces. If those houses are not needed and they are not going to sell the developers won't build them. And that's the way it is. They won't over build so that house prices come tumbling down.

The wont build houses that won't sell they're in the profit making business. If the whole thing turned out to be completely wrong and there was a property crash tomorrow they just wouldn't be built. The market will always dictate." (His comments can be seen on the Guildford Borough council webcast of the debate at 2hours and 7mins into the webcast http://www.guildford.public.i.tv/core/portal/webcast_interactive/215454)

Isn't that just an abdication of responsibility? If the market does it all why do we even need civil servants? Not even Margaret Thatcher believed the market was that perfect. It is ironic that Mr Taylor has now left GBC and so will never be held to account for the Local Plan which he promoted.

We the public are now asked to express an opinion on a Local Plan which does not even explicitly set out the Housing Requirement, or the arithmetic showing how it is derived from the Objectively Assessed Need. And the OAN itself has never been scrutinised by the Scrutiny Committee. NO ONE in the council has ever seen, let alone critically examined, the housing projections model. The Council is supposed to be subject to the rule of law - and part of the role of the civil service is to make sure that the politicians are not a law unto themselves.

The fact that neither Woking BC nor Waverley BC are able to scrutinise the housing projections model means that the projections for the whole of West Surrey are effectively a secret.

It appears that the Council has deliberately exaggerated the economic growth projections and projected population growth on the basis of a short unrepresentative period of international migration in order to maximize the housing need forecast. The motivation appears to have been driven by a desire to use housing as an 'exceptional circumstance' to justify building on certain sensitive Green Belt sites.

The very close association of the GBC with certain developers - in particular Surrey University and Wisley Property Investments Ltd with whom it has collaborated extremely closely over the past three years - appears to be the motivation for GBC proceed on the basis of exaggerated housing need numbers in order to facilitate removing those developers's sites from the Green Belt.

The closeness of GBC to development interests is amply illustrated by the promotional video produced for the local plan which can currently be seen on the GBC website. Rarely have I seen a more one-sided presentation of an argument. The video features a succession of speakers for interested parties and vested interests - such as Surrey University - all speaking in favour of the local plan.

The proposition that house prices are a function of supply of houses is plainly false. The annual supply of houses has seldom approached as much as 2% of the housing stock. Supply is therefore not the major determinant of prices - which are more plausibly explained by factors such as

- international investment demand
- quantitative easing by the Bank of England and its effects on mortgage lending
- Bank of England interest rates at 0.5% - the lowest in centuries - if not ever

The evidence that there is a housing shortage is not self evident. The ratio of population to housing in the borough is very roughly two people for every house - which does not obviously demonstrate a housing shortage. The greatest shortage of
housing is in fact in social housing. This is largely the creation of government policy. GBC had not built any council houses for twenty years until the past couple of years. And its rate of construction is still smaller than the quantity of council houses sold each year. The total number of council houses owned by GBC has fallen some 15% since 2000 and continues to fall. The shortage has not been taken up by Housing Associations.

The basis on which the Local Plan has been prepared is not even amateur. It is shoddy and unprofessional. The evidence base obviously suffers from selection bias. The analysis is so feeble it cannot for the most part be disclosed. It is a charter for developers such as Surrey University and Wisley Property Investments Ltd, the nature of whose relationship with GBC and its Councillor is a matter of concern. Blatant political bias is apparent in, for example, the desire to create new Green Belt near the ward of the Lead Councillor for the Local Plan whilst destroying its elsewhere. A Council which seeks to set off the biggest building boom in the borough's history has a duty to justify its proposals with proper evidence and reasoned argument. Instead it has sought to use its large majority to ignore real public concerns.

Enclosures:

- Freedom of Information request for Guildford SHMA /GL Hearn's housing projections model - July, 2014
- Response of GBC dated 2 October, 2014 claiming that the GL Hearn model is commercially sensitive and the intellectual property of a third party
- Woking BC response to FOi request for the West Surrey SHMA housing projections model
- Waverly BC response to FOi request for the West Surrey SHMA housing projections model
- 16 May, 2016 letter to Surrey Advertiser re petition
- Change.org petition comments
- Change.org petition signatories
- GB Paton letter to Surrey Advertiser
- PAS publication 10 key principles for owning your housing number
- GBC/Neil Taylor letter to Surrey Advertiser
- GB Paton complaint to GBC dated 10 June, 2016

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

Attached documents:
- LP2016 Woking BC Responce GB_Paton.pdf (288 KB)
- LP2016 GBC Responce GB Paton.pdf (198 KB)
- LP2016 ChangeDotOrg Comments GB_Paton.pdf (5.5 MB)
- LP2016 Complaint to GBC GB_Paton.pdf (1.7 MB)
- LP2016 10 key principles for owning your housing number GB_Paton.pdf (4.6 MB)
- LP2016 Woking Letter to Surrey Advertiser GB_Paton.pdf (489 KB)
- LP2016 GBC Responce GB_Paton1.pdf (471 KB)
- LP2016 GBC_Neil Taylor Letter to Surrey Advertiser GB_Paton.pdf (1.5 MB)
- LP2016 ChangeDotOrg Signatories GB_Paton.pdf (6.5 MB)
- LP2016 FOI Request GB_Paton.pdf (159 KB)

Comment ID: PSLPA16/182  Respondent: 8749793 / David Worsfold  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I strongly object to the Draft Local Plan for the following reasons

1/ The SHMAA is set at too high a figure for the needs of the Borough. The methodology used to arrive at this figure of 693 houses per year has not been revealed to public scrutiny and so cannot be a checked or even considered as a valid
Especially considering the previous house building figure which was half. Furthermore insufficient consideration has been made of constraints such as the high percentage of green belt within the Borough.

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

Attached documents:

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     - flaws in the method for estimating the number of homes needed to support job growth.
   - It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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

Attached documents:
I have considered the Proposed Submission Local Plan and once again find it entirely unacceptable. It is an unsubstantiated, aggressive expansionist proposal that would have a substantial impact across the region to the gross detriment to the residents of this borough. I support the details in the submission made by East Horsley Parish Council and offer the following additional comments:

The scale of development is disproportionate to the needs of the community and the assumptions on which it is based are fundamentally flawed, particularly following the recent decision to leave the EU and stem the levels of migration into the UK and the impact of negative economic growth forecasts.

On this basis I reject the ONS data as the assumptions on which it is based made are no longer valid and the projected population increases of some 15% for Guildford Borough over this period are grossly overstated.

Therefore the proposed scale of this building programme representing an increase of 25% in the housing stock is, at best, outrageous given also that the majority of it is within the Green belt in breach of planning policy.

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

Attached documents:

Comment ID: PSLPA16/214  Respondent: 8752513 / R Attfield  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The required level of affordable housing is substantially overstated and given the current economic forecasts and impact on housing prices in particular is further likely to provide some relief in this area.

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

Attached documents:

Comment ID: PSLPA16/3018  Respondent: 8769793 / Laura Richards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to
consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

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1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.
° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
° The current SHMA inflates the proposed housing figure due to
° failure to correct for errors in the historical data for international migration flows,
° issues with the way it considers students and affordability and
° flaws in the method for estimating the number of homes needed to support job growth.
° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially
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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/1270  Respondent: 8770177 / Phil Attwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1231  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

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<td>The method used to establish that 13,860 new houses are required, by a sub-contractor not being disclosed to residents (or councillors?) paid for out of our taxes!</td>
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<td>3) I find is disgusting that with only two weeks notice the number of proposed houses was increase so significantly, It almost looks corrupt as they were added in at the last moments when the majority of residents were looking and discussing the EU referendum to be aware of a local issues that had changed so significantly from the original proposal.</td>
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<td>Please see documented below my objections to the final draft local plan (consultation period 6 June to 17 July). Please ensure that my comments are referred to the Inspector.</td>
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I object to the lack of evidence supporting future housing needs (which need further review in light of Brexit)

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

Attached documents:

Comment ID: PSLPA16/193  Respondent: 8775169 / Shaun Cheyne  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Needs assessment:

I questioned the scale of housing demand on which the revised draft local plan was based when first published. With the recent decision to leave the EU, and better control over immigration being a key argument in favour of this, I cannot see how the current demand forecasts are remotely reliable. I trust the study will need to be revised in light of the Brexit decision.

Evidence base and Infrastructure:

GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows c. 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. I simply cannot see why industrial space is needed at Burnt Common. With the proximity of the housing and industrial sites to the motorway, I expect that these will not serve the local community but rather be suited to those commuting in (to work) and out (if housed) of Send. This does not fit the objectives of providing housing for future requirements of the local community.

I want to point out that the GBC’s Transport Assessment was not available to Councillors for the vote taken on 24 May 2016, being published on 6 June. The plan does not have enough consideration for infrastructure overload. The road network in the Send area, particularly Send Marsh Road and the A247 linking Portsmouth Road and the A3 to Woking cannot handle any more that it already does. It is impossible at the moment particularly during peak times. The proposal of a 4 way interchange onto the A3 would mean that the roads through Send Marsh and Send would become the main link between the A3 and Woking, completely changing the village into a thoroughfare.

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

Attached documents:

Comment ID: PSLPA16/3772  Respondent: 8775201 / Nick Harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I wish to register objections to the Local Plan due to the number of homes (SHMA) to be built according to the Local plan.

The number of homes (SHMA) to be built according to the plan is nearly 14,000 (690 per year for the duration of the plan). This number excludes any permissions that have already been granted, as well as windfall sites.

My objections are based on a number of reasons:
1. The SHMA number is resulting in Guildford Borough Council encroaching into the Greenbelt without special circumstances.
2. There is no justification of the figure or how it has been calculated.
3. The growth value is too high
4. Guildford Borough Council has not applied any constraints to the SHMA figure to allow for the lack of appropriate infrastructure or to protect our countryside from development.

With reference to the number of issues I have listed above it is clear that the number of homes (SHMA) included within the plan is far too high and needs reviewing by Guildford Borough Council As Soon As Possible.

Please acknowledge receipt of my letter

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

Attached documents:

Comment ID: PSLPA16/4166  Respondent: 8775201 / Nick Harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

With reference to the number of issues I have listed above it is clear that the number of homes (SHMA) included within the plan is far too high and needs reviewing ASAP.

I am also very concerned about Guildford Borough Council’s unwillingness to reveal how the figures were calculated despite requests by the public.

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

Attached documents:

Comment ID: PSLPA16/377  Respondent: 8776417 / Nici Holland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. The proposal to build 13,860 new homes is based on pre-Brexit projections for economic and population growth, including migration which now need to be revised downwards. It should also be noted that many people (looking at research statistics) work further afield thus the need for local housing becomes unimportant for the local population. We need development that meets the needs of the present and that does not compromise future generations. Local people should be empowered to shape their surroundings, understanding the character of their own unique areas (eg protecting the Green Belt). What about constraints and density?

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

Attached documents:

Comment ID: PSLPA16/379  Respondent: 8776417 / Nici Holland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
1. The figure of 13,860 new homes is unsubstantiated. Guildford proposes to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. I

2. It should be noted that, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860 which undermines the validity of the consultation. There is no clear Housing Target.

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

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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Ref The Proposed Submissive Local Plan

1. I would like to express my concerns about a number of the proposals in this revised Local Plan, and the evidence and assumptions on which it is based. In particular, I am concerned over the number of homes proposed over the period of the plan. The Plan calls for a 25% increase in the housing stock across the borough. This is set against the Office of National Statistics (“ONS”) projections of a population increase of only 15% for Guildford Borough over this same period.

2. Statement by all political parties and candidates in last year's election said that “We will continue to protect the Metropolitan Green Belt” this has proved clearly not to be the case. That view was fully supported by the now majority party. A similar statement is still retained in the "proposed plan". However, GBC appears now to be totally disregarding these undertakings, with the policies it has set out in the Local Plan, whereby some 65% (see Appendix A) of proposed new developments will take place on land which is currently Green Belt. The infrastructure proposals education, transport, waste water treatment, to support this level of development are completely inadequate even to meet the needs of what is there at the moment, as a result of underinvestment in the past let alone the proposed new developments.

3. I therefore OBJECT to the Local Plan as a whole.
In order to expand upon and emphasise points a more detail analysis is provided in the following paragraphs, together with a number of other more detailed points of particular concerns.

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

Attached documents:

Comment ID: PSLPA16/41  Respondent: 8792193 / Brian Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. Strategic Highway Assessment Reports

The comments set out below relate to the above report. All heading and numbers relate to that document. The text in black is taken from Strategic Highways Assessment Report, the text in blue are my comments and or objections.

1.1.1 Guildford Borough Council (GBC) has prepared a Guildford borough Proposed Submission Local Plan: strategy and sites (June 2016), hereafter referred to as the Proposed Submission Local Plan. Given the similar timescales, a joint modelling assessment was undertaken by Surrey County Council (SCC), GBC and Waverley Borough Council. The absence of any cooperation, involvement, with other Boroughs mainly those to the East including Elmbridge and Mole Valley it is impossible to determine the true impact of traffic flows through the Borough. For example how much of the traffic entering Guildford from the east flows through the borough, or end it journey in the borough. In a similar way how much traffic entering from Waverley flow through the borough and or end it journey in the borough. This may have been captured in respect to Waverley but is not clearly identified from the east. The impact of the Wisley development will have significant impact on SRN & LRN in other boroughs on Guildford north east borders.

1.1.3 The assessment made use of SCC’s strategic transport model, SINTRAM. It has been acknowledged by SCC that the SINTRAM model is not suited for measuring the detailed impact of developments on traffic on SRN or LRN in a localised area. It even has some limitations when used on a county wide basis. It is not fit for purpose in the local planning scenarios; This has been pointed out by a number of transport consultants including one who prepared a recent report for Waverley.

1.1.4 This document sets out details of the transport model, the forecasting methodology, as well as the results and analysis of the traffic impacts of the potential development sites and future highway mitigation proposals.

If you are to achieve the objective set out in 1.1.4 how can you make the statement below?

1.1.5 This study does not consider aspects such as:

• Accessibility to facilities and services by either car or non-car modes from the potential development sites; ??
• The impact on existing public transport services such as passenger overcrowding and possible delays to services as a result of increased traffic congestion; ??
• What opportunities there might be for reducing the number of car trips to and from any potential new developments by enhancing sustainable transport facilities and services; and Perhaps this one is best discounted as perceived mode changes expectations are now being discounted by a number of recent studies.
• What additional highway mitigation might be required to address the identified impacts?

1.1.6 Accessibility issues and impacts on public transport services might have to be considered in separate study work. The consideration of increasing sustainable travel and identifying additional highway mitigation could be done at a later stage, potentially to support submission to the Secretary of State or Examination in Public. This report will act as useful starting point for undertaking such additional study work.
Without the above work in 1.1.5 and 1.1.6 the Guildford Borough Proposed Submission Local Plan in is not fit for purpose as there is no evidence to suggest it is deliverable. And it is questionable that it even identifies what is needed. The evidence to support its deliverability has to be part of the public consultation now, not in the future.

2.1.4 This makes SINTRAM a suitable tool for Guildford Borough Proposed Submission Local Plan assessing the potential traffic impacts of the potential developments and future highway mitigation proposals at this initial review stage.

It is the assessing of the potential traffic impacts of potential developments that in the local context SINTRAM is unable to do. It is at best a ball park assessment tool.

3.2.3 Proposed improvements

- A3 southbound off slip and northbound on slip at Burnt common accompanied by traffic management through Ripley.

The junction at which the most disruptive impact will be felt as a result of the Wisley site is in Ripley and this is "dismissed with a traffic management solution". The developers of Wisley and their various consultants together with SCC have not been able to come up with a satisfactory solution in over 3 years of discussion!! Could it be that there is no viable solution!!

Old Lane converted to one-way northbound between the Wisley access and Common car park; This proposal has been objected to by local residents and would require separate consultation. The conversion of old lane to one way will place an increased load on Painshill roundabout which already causes tailbacks onto the A3. More traffic going into Cobham and increased in traffic on Horsley Road which is classified the same as Old Lane. If this proposal were to go ahead it would simply move an even greater problem somewhere else. This will not benefit local residents in any way.

- A3 Ockham Interchange improvements;

The details produced for these improvements were not approved by HE or SCC. as there were road safety issues.

Figure 3.1a: Outline of scenarios

The defined development has changed from those defined for scenario 2 in 3.2.1 with no satisfactory explanation as to why.

3.2.8 The potential future development sites that have been identified by GBC have been captured in 2031 scenario 2 onwards.

Not consistent with fig 3.1a. which definition is correct?

3.4.1 Vehicle trips generated by each committed and potential development site were calculated using the information contained within the pro-forma and the Trip Rate Information Computer System (TRICS) version 2012(b) 6.10.2. But no information is provided on the comparable locations in TRICS. This is critical particularly when dealing with new town isolated developments that are not regarded as urban extensions. The ones chosen by the developer for Wisley were totally inappropriate and not accepted by SCC. who requested a 20 % uplift was required.

3.4.8 A cumulative summary of the trip generation for the scenarios and time periods for the whole of Guildford borough has also been provided in Table 3.5.

<table>
<thead>
<tr>
<th>Taken from table 3.1 to 3.4</th>
<th>Vehicle Arrival Trips</th>
<th>Vehicle Departure Trips</th>
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<tr>
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<td>HGV</td>
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<tr>
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<td>PM</td>
</tr>
<tr>
<td>----------</td>
<td>-----</td>
<td>-----</td>
</tr>
<tr>
<td>Effingham -Horsley Scenario 1</td>
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<td>23</td>
</tr>
<tr>
<td>Effingham -Horsley Scenario 2</td>
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</tr>
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</table>

Data from Table 3.1 to 3.4

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<th>PM</th>
<th>Dif scenario 1 -2</th>
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<td>144</td>
<td>42</td>
<td>-90 -54 -13 -22 91 90 7 -6</td>
</tr>
<tr>
<td>Horsley -West Horsley Scenario 2</td>
<td>54</td>
<td>48</td>
<td>120 112 11 -3 -34 -7 -7 -19</td>
</tr>
<tr>
<td>Horsley -West Horsley Scenario 1</td>
<td>102</td>
<td>32</td>
<td>131 94 17 20</td>
</tr>
<tr>
<td>Horsley -West Horsley Scenario 2</td>
<td>18</td>
<td>5</td>
<td>97 87 10 1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Scenario</th>
<th>AM</th>
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<td>23</td>
<td>-32 -21 -6 -5 -19 -14 -3 2</td>
</tr>
<tr>
<td>Effingham -Horsley Scenario 2</td>
<td>-13</td>
<td>3</td>
<td>-15 -12 -3 -1 -32 -22 -5 -5</td>
</tr>
</tbody>
</table>
It is noted that the zone definitions have changed from those set out in table 3.5 zone 119 North Horsley & Effingham.

2.5.2 The borough of Guildford is split into 68 zones

119: East Horsley & Effingham borough of Guildford zones

502: Horsley – West Horsley –

There is no such location as North Horsley. Development is planned to take place in both East & West Horsley.

It is also interesting to note that more traffic is generated in zone 119 in scenario 1 than when development takes place in scenario 2 see table above. How can this be the case?

The high level of arrivals in West Horsley am in scenario 1 could be accounted for by school runs but again why do they reduce by nearly 100% when the developments are built?

The two railway station at Effingham and East Horsley will serve the Wisley development yet the scenario 2 AM traffic arrivals in zone 119 and 502 both show lower level of traffic than scenario 1 with no development. How can this be the case?

Table 3.3: 2031 scenario 2, weekday average AM peak hour (1600 – 1900) correction 0700- 1000 or are they in fact the PM figures they might make more sense if they were.

3.6.1 The origin and destinations of trips travelling to and from the development sites, known as trip distribution, were derived from the 2011 Census journey to work dataset. However, GBC instructed SCC to apply a different distribution for the proposed development at Wisley Airfield, specifically the distribution developed for the site specific transport assessment as documented in ‘Wisley Airfield Transport Assessment’ (WSP, December 2014).

How can GBC justify instructing SCC to apply a different basis for determining trip origin and trip destinations? How can they justify using a third party assessment with a vested interest in the outcome. SCC had questioned the outcome and methodology of the original TA submitted by WSP.

3.6.4 Table 3.6 details the modelled zones that formed the six distributions.

Separate average distributions were developed for each of these areas using the journey to work dataset.

It is unclear why Zone 119 was not included in the journey to work dataset used in the analysis East Horsley with two railway stations and little if any internalisation (little of no local employment) was not used as it is would have shown unique profile compared to other locations, This is a serious omission.

4.1.5 The strategic highway assessment therefore accounts for the transport demand from all planned development proposed in the Proposed Submission Local Plan in the period to 2033, including the new homes, employment space, retail space and schools. It also accounts for all planned development proposed in Waverley Borough Council’s forthcoming draft Local Plan in the period to 2032, and all transport demand in the rest of the United Kingdom to 2031.

This is not true as the trip generation used for the Wisley development is not correct nor has it been agreed with SCC it does not include the school and have used unsupported internalisation data.

4.1.7 Firstly, in Scenario 3, those key highway schemes providing access to the large development sites and local highway schemes in both Guildford and Waverley boroughs, are tested;

This is not correct as it does not include the works associated with the Wisley development and Wisley should be regarded as a large development.
4.1.8 The strategic highway assessment also makes no allowance for any internalisation of trips within the larger sites. The figures used for trip generation on the Wisley site TA did take account of an internalisation adjustments of 20%. So how it is the trip figure you using that does not include internalisation are currently is lower than that in the TA. Also on the Wisley site no account was taken for trip generation to the secondary school from the catchment area off site.

4.1.11 More detailed modelled forecast traffic impacts for the average PM peak hour can be set out in an addendum report at a later date. This is not acceptable with your current knowledge of the sensitivities' surrounding existing traffic flow close to the Wisley site. The detailed analysis is required now. It is acknowledged that the SINTRAM modelling is a broad brush tool that requires more in-depth work before the full impact locally of development can be assessed. If the Local Plan is approved in its current format planning permission would be presumed as approved with little incentive to agree or consult over detail. Developer's lawyers will be doing cartwheel and back flips in anticipation.

Figure 4.1: Initial assessment: assigning Local Plan related average AM peak hour trips to an uncongested network to show preferred routes of travel.

4.1.3 However, it should be noted that this assessment assumes all drivers will follow the least cost route as perceived in uncongested conditions. Furthermore it assumes that there is no highway mitigation in place. Why have no alternative scenarios been modelled e.g. drivers following the quickest route, or least congested.

4.2.1 Tables 4.1a and 4.1b show the network summary statistics for highways in the study area of Guildford borough only, for the weekday average AM and PM peak hours, broken down by road type for each model scenario. The potential traffic impacts are reflected in changes in vehicle kilometres travelled vehicle hours and average speed.

The conclusions reached cannot be validated or relied upon as the above tables 4.1a and 4.1b contain over 100 arithmetical and computing errors this is clearly the result of cutting and pasting spreadsheet results from numerous runs of data resulting in a mismatch of inconclusive and unreliable data.

I would like to add to these comments following a more in-depth analysis of the numerical data.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3981</th>
<th>Respondent: 8794753 / Andrew Beckett</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>
<td></td>
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</tbody>
</table>

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:
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.

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

Attached documents:

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8. I object that there has not been and demand that (a) there should be a significant challenge to the GBC scenario planning and (b) the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

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

Attached documents:

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Objection to Guildford Borough Council proposed Local Plan (June 2016)

I object most strongly to the Guildford Borough Council proposed Local Plan (June 2016). The plan is unworkable and unsustainable and seems to have several errors.

I object to the SHMA numbers. The figures for housing needs are pre-Brexit and so need to be adjusted, however we have not been able to scrutinise the methodology used to establish the numbers so question their validity.

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

Attached documents:
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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

Attached documents:

Comment ID: PSLPA16/4112  Respondent: 8797601 / David Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

> I live in West Clandon and I hereby register my opposition to the 2016 Guildford Draft Local Plan.

> Just generally, and in common with many others, I do not believe the suggested housing figures have been calculated properly.

> It appears to overstate the housing need.

> The Council has prevented Councillors and others from properly considering the SHMA by refusing to make public the basis upon which it was drawn up.

> When properly recalculated, the housing figure should be subject to constraints to reflect Guildford’ circumstances, including in particular the Green Belt and road infrastructures.

> National policy permits such restraints to be applied and I feel it is inappropriate of you not to consider the need to do this.

All the data collected was done pre Brexit and is therefore invalid.

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

Attached documents:

Comment ID: PSLPA16/4123  Respondent: 8798753 / Jane Reeves Newell  Agent:
I live in West Clandon and I hereby register my opposition to the 2016 Guildford Draft Local Plan.

Just generally, and in common with many others, I do not believe the suggested housing figures have been calculated properly.

It appears to overstate the housing need.

The Council has prevented Councillors and others from properly considering the SHMA by refusing to make public the basis upon which it was drawn up.

When properly recalculated, the housing figure should be subject to constraints to reflect Guildford’ circumstances, including in particular the Green Belt and road infrastructures.

National policy permits such restraints to be applied and I feel it is inappropriate of you not to consider the need to do this.

With regard to specific policies they appear to be so vague, general and carelessly formed that they commit the Council to very little at all. I object to all of the policies in this 2016 Guildford Plan.

All the data collected was done pre Brexit and is therefore invalid.

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

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- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to:

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

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I consider the "objectively assessed need" figure of 693 homes a year is too high.

- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes

Page 13 of 17
NJ Taylor-Objection to local Plan

- The current SHMA inflates the proposed housing figure due to a failure to correct for errors in the historical data for international migration flows, a issues with the way it considers students and affordability and a flaws in the method for estimating the number of homes needed to support job growth.

- It is unacceptable that demographic and economic model assumptions have been withheld by the council and treated in secrecy by the council and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers.

However, it is based on "commercially confidential" modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy.

This is not democratic and is not appropriate for consultation of the Plan.

Page 20 0125
William Taylor - Objection to Local Plan

- The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Beit, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/587  Respondent: 8800705 / Michael Cumper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

More generally I object to the stated housing need figure of 13,860, which is an unnecessarily high purely to the methodology used in arriving at it. It is flawed.

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

Attached documents:

Comment ID: PSLPA16/1111  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
3) 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.

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

Attached documents:

Comment ID: PSLPA16/747  Respondent: 8806849 / Roland McKinney  Agent:

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

I object to the inclusion of many of the documents in this "Evidence Base".

In particular, I object to the inclusion of:

The Green Belt and Countryside Study, which is subjective and exhibits examples of predetermination in its conclusions. It is a very shoddy piece of work

The SHMA which did not objectively research the housing market and reached a housing needs number which is grossly exaggerated because the authors demonstrated they did not have the skill required to properly assess the underlying factors behind the population growth numbers produced by the ONS

The Employment Land Needs Assessment 2015, especially for the unambitious targets for efficiency of land use and its selective use of statistics.

These poor quality of these reports (and probably others) no doubt has been influenced by the lack of continuity in producing the plan, with an extraordinarily rapid turnover of council officers and consultants associated with the production of the plan, coupled with the turnover of Councillors responsible for the plan - 3 in 3 years is a poor record. No doubt too that the consultants were responding to the council objective, which was declared to be "to roll back the Green Belt". There can be no doubt that this objective was made clear to consultants when they sat in meetings to plan the production of their reports.

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

Attached documents:

Comment ID: PSLPA16/1403  Respondent: 8809441 / Cameron Brown  Agent:

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

Objections to Guildford Borough Council Proposed Local Plan (June 2016)

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.

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2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard my objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

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1. **APPENDIX D**

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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/3991  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
• failure to correct for errors in the historical data for international migration flows,
• issues with the way it considers students and affordability and
• flaws in the method for estimating the number of homes needed to support job growth.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4020  Respondent: 8810849 / Charles Lee  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

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

Attached documents:

Comment ID: PSLPA16/3608  Respondent: 8811009 / Rosalind Gleeson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I believe the number which has been given of 693 as an annual target for new housing is far too high. We have still not been given information about how this number was arrived at, or whether it has been checked - it appears to have been provided by a company whose claim is that they represent developers.

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

Attached documents:

Comment ID: PSLPA16/2204  Respondent: 8812097 / Clare Benzikie  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2916  Respondent: 8812833 / Simon P Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

There is also a lack of any real evidence for the need for these massive housing developments. They will not significantly reduce the cost of local housing for local people because in the main they will attract people from outside of the area and our local people in need of housing won't be able to afford them.

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

Attached documents:

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Comment ID: PSLPA16/4000  Respondent: 8813281 / P J Ryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I have grave doubts over the proposed number of new houses arising from the SHMA. This number was generated by a Consultants mathematical model which has not been revealed in the Plan nor I believe to GBC. Never the less GBC,
without factual evidence justifying their decision increased the target number of houses by some 70% higher than the national estimates of population growth in the Borough. Before any final decisions on numbers are made I feel it incumbent upon GBC to give an adequate reason for their decision making.

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

**Attached documents:**

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I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

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

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<th>8813601 / Gaenor Richards</th>
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- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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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: PSLPA16/2457  Respondent: 8817121 / Celia Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

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

Attached documents:

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Comment ID: PSLPA16/4153  Respondent: 8817377 / Mark Silcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

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

Attached documents:

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Comment ID: PSLPA16/1585  Respondent: 8817569 / Peter Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The increase in house prices is not solely due to increased population demand but a range of temporary one off factors that include historically very low interest rates and the increase in household income following the growth in double income families. Interest rates in the medium to long term will rise to normal levels and the number of two income families will stabilise. Both these changes will lead to UK house prices becoming lower relatively. House prices have also been recently increased temporarily by high levels of overseas investment in UK property. However, recent changes to housing taxation have already reduced this overseas investment.

Recent UK population growth should also not be assumed to continue; this growth has been driven largely by high levels of EU immigration in the last 10 to 15 years. Following the EU referendum, immigration from the EU is likely to fall rapidly and indeed given the fall in the £, many recent migrants may well return home. The assumptions behind the projections need to be brought up to date once the BREXIT terms become clearer and the projections recalculated before the Local Plan is finalised.

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

Attached documents:

Comment ID: PSLPA16/1520  Respondent:  8817953 / Sheena Ewen  Agent:

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.

- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects

- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability, and--
  - flaws in the method for estimating the number of homes needed to support job growth.

- It is unacceptable that demographic and economic model assumptions have been withheld from scrutiny and therefore cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is more than double the figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. **This is not democratic and is not appropriate for consultation of the Plan.**

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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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: PSLPA16/3382  Respondent: 8819265 / Alan Robertson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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.

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

Attached documents:

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Comment ID: PSLPA16/3214  Respondent: 8820353 / Gillian Beaton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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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:** PSLPA16/258  **Respondent:** 8820929 / A J Stuart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I object to the distinct lack of evidence as to the alleged housing need numbers. We all know that there is a shortage of affordable housing locally and that most local young people are forced to move away from this area in order to be able to start out on the property ladder, given the exceptionally high house prices, however one cannot be expected to agree to a Local Plan without any robust evidence of what volume and what type of housing is required, within what timeframe.

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

**Attached documents:**

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**Comment ID:** PSLPA16/1676  **Respondent:** 8821985 / Stephen Hofmeyr  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

We are members of the Tyting Society and the Parish church.

We write to oppose Guildford expanding by a quarter. The need for expansion of this order is not made out on the facts and there is no reason why Guildford’s expansion should not be constrained and mirror that of surrounding towns and boroughs. We need to base our local plan on watertight, not flawed evidence.

We also write to express our support for the submission by the Tyting Society and the response from the Guildford Residents Association

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

**Attached documents:**

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**Comment ID:** PSLPA16/2018  **Respondent:** 8825377 / Jane MacIntyre  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Growth should be in response to local need and not randomly imposed with disproportionately high numbers of houses built in a relatively short time. I remain unconvinced of the assertion that there is evidence to support the increase in
housing. I have no confidence in a population forecast that has been arrived at by methodology that is not open to scrutiny and is 70% higher than national forecasts.

Why the lack of transparency? It is natural to conclude that the motivations and interests behind the draft plan are highly suspicious.

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

Attached documents:

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Comment ID: PSLPA16/795  
Respondent: 8825697 / Online imaging (Peter Gelardi)  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The Housing requirement figure (SHMA) is an outrageously high number, not justified in any way. Produced by a firm who specialise in providing distorted numbers for housing developers. The fact that the calculations are not made available is something that I hope the executive of the GBC will be held accountable for in a court of law some time soon.

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

Attached documents:

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Comment ID: PSLPA16/1996  
Respondent: 8825825 / Rebecca Young  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Objections to the basis of Guildford Borough Council Local Plan

- The basis of the calculation of SHMA for Guildford Borough is yet to be made available for examination. It would seem that we are supposed to trust the numbers generated by GL Hearn and their confidential model. The council members themselves are divided on the validity of the SHMA. (Ref A Review of the Guildford Objectively Assessed Housing Need (as documented in the West Surrey Strategic Housing Market Assessment, Final Report, September 2015) by Councillor David Reeve). GBC should make the basis for the 700 new homes per year in the borough available for public scrutiny and ensure that the model is validated independently.

- It would appear that GBC have not applied the relevant constraints to the required housing target to take into account Greenbelt, Surrey Hills AONB, Thames Basin Heaths Special Protection Area, etc, preferring to pursue a "maximum growth" agenda. This is in contradiction to the local Conservative Party's election pledge of protecting the green belt, so cannot be a reflection of the views of local people. I think that GBC should apply the constraints available to them (due to the specific environmental factors) to reduce the housing numbers.

- The GBC policy of strategic sites rather than smaller, more proportionate developments with each ward taking its fair share appears to be unjustified and could be viewed as engineered to skew the impact to a few voting members of the council. The policy of strategic sites seems to make a mockery of local democracy.

I acknowledge the need for more housing, but I would prefer to see the re-development of brown field sites and smaller developments distributed around the villages. I think this would better preserve the character of the borough as a whole.
I hope that my views will be taken into account as part of the public consultation process.

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

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<td>• I consider the calculation of housing need is unsubstantiated. The model has not been scrutinised and fundamental assumptions are flawed. Housing target is unconstrained;</td>
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• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/3196  Respondent: 8826529 / Martin Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. Site 62 Liddington Hall. 625 houses and 2 Traveller pitches.

This site has been proposed and turned down several times in the past. I am sure the reasons are still valid.

This site falls within the Metropolitan Green Belt and meets 4 of the 5 purposes for Green Belt land. Very special circumstances would need to be demonstrated to enable development to take place on this land. Development of this site would result in the coalescence of the town and Fairlands.

Rydes Hill ridge is 150ft above the general level of the rest of Worplesdon and is visible from much of the parish. The development would be strikingly visible, as if Guildford is coming over the hill, housing being visible on the skyline. It is therefore particularly important to preserve these fields.

The site is located within 400m – 5km of Whitmoor Common SPA, SSSI and forms part of a vital wildlife corridor linking Whitmoor Common SPA, SSSI, Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI), Broad Street and Backside commons (SNCI) to the Hogs Back AONB.
In 2003 Natural England objected to the proposed development of this site.

There are a number of endangered and red list species that inhabit this site including: Badgers, bats, cuckoo, house sparrow, barn owl (RSPB amber list), great spotted woodpecker, green woodpecker. Red kites and buzzards are also known to use this site.

This site is proven to be contaminated with cyanide –

“Cyanide burials at Liddington Hall Farm

During the last war, Martin Harper had a works on the northern edge of the Farm. Amongst other things, they made barrage balloon hoists which they case-hardened with cyanide, a process which produced highly-toxic slurry. It was disposed of in a succession of burial pits in unknown locations spread across the site. This took place monthly during the period 1940-47, so there may well have been 100 burial pits. It is a fair assumption that they would be well spaced out.

A remaining presence of cyanide was verified by sampling in 1983 (Guildford Borough Council News, No. 452, 18th May 1983). Cyanide degrades over time but Professor Jim Bridges, Professor of Toxicology at Surrey University has said, “If cyanide is combined with certain metals, as it is in case hardening, and if it is buried in soil, it can be longer lasting”. Furthermore, the depth and precise location of the burials is unknown.

In 1983, Norman Payne, Guildford Council’s Head of Personal Services said: “The levels of contamination do not on all the information before me present a hazard to the public SO LONG AS THE GROUND IS UNDISTURBED.” (These are Mr Payne’s block capitals.)

This site could not cope with the proposed level of traffic that would be generated by 625 houses. In previous planning appeals traffic has played a major part in the planning appeals being dismissed and the traffic situation has deteriorated since then due to the high level of housing built in Stoughton.

North West Guildford has serious traffic problems already, as the A322 and A323 funnel into the Dennis roundabout. This factor has been cited previously in the rulings in three failed development proposals.

In 1976, Davis Estates proposed a large development between Holly Lane, Gravetts Lane and Tangle Lane. It was refused. Davis Estates appealed. The appeal failed, the Inspector stating:

“The proposed development, in my opinion, would further impair the efficiency of both the A323 and A322 which, as principal roads connecting Guildford to the M3 and the major growth area, must be safeguarded as part of the Nation’s primary network of roads”.

In 1983, Liddington Hall Farm was identified for building in the Draft Local Plan of that time. The County Engineer wrote to the then MP, the Rt. Hon. David Howell, concerning the Surrey Structure Plan:

“Accordingly the County Council as Highway Authority will seek to prevent the grant of any planning permission which would significantly increase traffic to the south of Liddington Hall”.

In 1985, in spite of the above, an attempt was made by the County Council to build on Liddington Hall Farm, which at that time they owned. The Inspector recommended:

“In my judgement, the discharge to A322/A323 of traffic from 700 dwellings additional to that arising from expected development at Tilehouse, Stoughton and from general growth of traffic would add unacceptably to prevailing congestion and danger on the main framework roads.”
In 2003, the Farm appeared again in the Deposit Draft Surrey Structure Plan 2002. Surrey County Council’s Officer Report to the Executive stated:

“The findings thus far suggest that the transport impacts associated with the North West community [the Liddington Hall site] would be significant and difficult to resolve.””

The site was dropped from the plan.

There are two ponds on the site – Great crested newts are known to exist in the vicinity.

Rights of Way over the eastern fields - Footpath no’s 576, 577, 578, 579 and 580 have recently been added to the definitive map for Worplesdon in accordance with the Wildlife and Countryside Act 1981 section 53.

The western fields are subject to prolonged and significant flooding during the winter months.

The existing infrastructure system cannot cope with the proposed number of houses. The local schools are over-subscribed, the sewerage system cannot cope. Man-hole covers are regularly blown in Gravetts Lane and the main sewers on Broad Street Common have burst over the past three winters causing environmental damage and considerable inconvenience.

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

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<th>Comment ID: PSLPA16/4513</th>
<th>Respondent: 8826529 / Martin Barker</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3059  
Respondent: 8827169 / Mark Blowers  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I writing to raise my objections to the Guildford Local Plan.

Firstly, I object to the accuracy of the Objectively Assessed Housing Need as outlined in Strategic Housing Market Assessment. Analysis supporting the conclusions for the OAN has not been made available to the public to review. I believe the OAN of 693 homes is excessive and the method of prediction is flawed. This is supported by reports issued by David Reeve, a Guildford Borough Councillor, and Neil McDonald, an independent adviser and commentator on housing demographics. In addition the recent referendum for the UK to leave the EU will probably have a negative effect on the housing need and should be taken into account. The Council’s primary responsibility is to those already living in the Borough and their children not to those predicted to migrate into the area. I would suggest the Council should be trying to limit migration into the area. Those migrating from London will generally be in the higher salary bracket and seeking larger houses, which is not what should be built. What is needed is affordable accommodation, close to existing areas of employment and transport hubs for the younger generations who already live in the area.

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

Attached documents:

Comment ID: PSLPA16/1236  
Respondent: 8827489 / Karen BRadshaw  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I OBJECT to the housing needs numbers included in the local plan as far too high.

An annual build of 693 new homes per annum represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics are projecting a population increase of some 15% for Guildford Borough over this same period. In particular over 23% of this new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys, totally out of proportion to the population living there.

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: PSLPA16/1175</th>
<th>Respondent: 8827777 / Mary English</th>
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1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:
1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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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: PSLPA16/2045  Respondent: 8828353 / Claire Richards  Agent:

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

I object to the calculations by Guildford Borough Council (GBC) on the number of homes that will be required in the coming years (13,860). The number of new houses arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant’s mathematic model that has not been revealed. This target has then further been increased by GBC to give a population increase that is almost 70% higher than the official national estimates for population growth in the borough. The old adage ‘if you build it they will come’ seems very apt here. The M25 was built to ease congestion and now it is referred to as the countries biggest car park. The results of the Brexit vote should now be seriously considered and a downward revision of the numbers should take place.

I object to the disproportionate number of houses being built in the Horsley’s – a total of 385 homes on four sites within West Horsley parish boundaries (this being a 35% increase to the current number of homes within the parish). A further 100 homes are proposed on a near by site in East Horsley, adjacent to the West Horsley parish boundary. This is greater than any other area within the Guildford Borough that would totally destroy the current unique character of the village. The Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages, so why are so many homes planned for this area? Who is going to live in them? Why are the urban areas not being developed proportionally?

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

Attached documents:

Comment ID: PSLPA16/2671  Respondent: 8828545 / Anjali Mittal  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: PSLPA16/3383  Respondent: 8830753 / Graham Thorpe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
The volume of additional housing and the accompanying loss of Green Belt land required to accommodate this is a brutal over-reaction to genuine planning needs. These latest proposals appear to be crudely based around some artificially drawn numbers already challenged without adequate reply in response to earlier consultations on this matter. The methodology employed for the SHMA remains a complete mystery and its subsequent handling by GBC is beyond reason. The only clear impression that leaves is of a design that simply seeks to identify all green spaces adjacent to existing housing and calculating the number of new dwellings that could be sited using a standard model to produce a number. We do not need a complex planning process and the use of expensive private consultants to reach such a flawed outcome. Any number of residents in the Horsleys could identify the selected plots if asked.

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

Attached documents:

Comment ID: PSLPA16/3574  Respondent: 8831809 / Ann Taylor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

• **Housing Numbers**: these are the key drivers of the draft Plan. The numbers coming out of the strategic housing needs assessment and feeding into all the work underpinning the draft Plan ought to be ones which have been thoroughly analysed, tested and widely discussed and agreed amongst all GBC councillors. Quite inexplicably, this has not happened. As I understand it, part of the analysis and process to produce the numbers has been less than transparent; and the numbers are not fully endorsed by councillors as the best available.

This is extremely concerning and not how ratepayers expect their Council to be conducting themselves in dealing with such an important issue. There should have been a fully open and democratic debate about what are key inputs to the planning process.

As the detailed Clandon submission points out, with Guildford being so close to London, the potential for growth could be unbounded: if we provide more houses, more people from London will come to live here. We need to be sure that our housing requirements make proper provision for the organic growth of our community and are not set to suck in additional growth from the London area. It is concerning that Guildford seems to be planning significantly more development than other boroughs in Surrey. Local people want sensible growth but not hot-house growth which positively seeks to attract many thousands of new people and jobs into the area and destroys the rural/urban balance which makes our area such an attractive place to live.

In any event, post-Brexit, the housing numbers will surely need to be revisited as both immigration and economic growth are expected now to be lower in the future than they would have been. This will give the Council the opportunity for a fully open debate about the figures and how they have been pulled together.

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

Attached documents:

Comment ID: PSLPA16/4002  Respondent: 8832513 / Richard Russell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Also of major concern is the calculation and quantification of the number of houses proposed in the Strategic Housing Market Assessment (SHMA): a target number that was generated by an external consultant’s mathematical formula of which no qualification or calculation is to be made available. As if this wasn’t unacceptable enough, the consultant’s unsubstantiated calculation has been further massaged by Guildford Borough Council to such an extent as to provide for a population increase across the Borough which is almost 70% above the official national estimates for population growth. WHY?

Furthermore, these unquantified numbers are obviously pre-Referendum / Brexit calculations and as such now need to be recalculated if they are to be meaningful? Furthermore with Theresa May becoming the new Prime Minister, time MUST be given for her to provide a clear policy statement on her plans for the Green Belt which, hitherto, she has long sought to protect.

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

Attached documents:

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Comment ID: PSLPA16/4251  Respondent: 8834401 / Property Consultant (John Everritt)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

A New and independent study is needed to give clear recommendations on the A 3. This should have been attached to any future Draft Plan. Before any road works are considered.

But, once approved, built, before any further housing is proposed.

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

Attached documents:

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Comment ID: PSLPA16/4053  Respondent: 8836129 / Roger Shapley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Habitats Regulations Assesment [HRA]

Response - NAG objects to the HRA and its Appendixes A, B and C

Summary

The HRA omits vital evidence and fails to fully assess the cumulative impact of all proposed development in the 400m-5km TBHSPA mitigation zone.

- It fails to show any base line 'real world' air pollution evidence.
- It pre-determines whether Natural England will act to approve both strategic and "bespoke" SANG submitted for planning approval.
- It demonstrates that Policy S2, H3, P2, P3, E1, E2, E4-9, I3 (13 out of 27 Policies = 50% approx of all policies) have an impact on TBHSPA but this is not referred to in the conclusion.
- It demonstrates that the majority of sites in 400m-5km mitigation zone need special HRA evaluations to be carried out (63 out of 82 sites in total [77%]) but this is not referred to in the conclusion.
• It fails to include an evaluation the most recent visitor survey of TBHSPA 2012/13 (see below)

Key Points of Objection

NAG objects to the omission of 2012/13 Natural England survey of visitor numbers to the TBHSPA report from the HRA
The HRA fails to list the 2012 Natural England Survey of Visitors to the TBHSPA as material evidence (Natural England Commissioned Report NECR136 Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA), First Published 13 February 2014; Natural England Project Manager - Patrick McKernan, Natural England, Guildbourne House, Chatsworth Road, Worthing, West Sussex, BN11 1LD; Contractor - Footprint Ecology, Forest Office, Cold Harbour, Bere Road, Cold Harbour, Wareham, BH20 7PA).

NAG objects to the failure of the HRA to examine the observed visitor trends between the 2005 NE Visitor Survey and the 2012/13 NE Visitor Survey
The 2012 NE visitor survey reports a 10% increase in visitor numbers. This is neither considered nor critically appraised as a contribution to the analysis of success or failure of the TBHSPA Avoidance Strategy 2009-2014 and the implications for Policy P2, P5, E8 and E9.

NAG objects to the failure to present evidence in the HRA whether or not current SANG or SAMMS policies are effective
The HRA fails to assess whether SANG and SAMM current policies and programmes are effective, either independently or in combination, in attracting visitors, cross-country cyclists and dog-walkers away from TBHSPA. On enquiry, Natural England admitted they have no such survey evidence for TBHSPA SANG or SAMM programmes.

NAG objects to the failure to properly assess the potential impact of disturbance and predation rates by newly introduced pet populations (dogs and cats)
The HRA fails to assess in detail, with associated numerical calculations and a described methodology that can be independently verified, the cumulative potential impact on disturbance and predation rates within TBHSPA by the introduction of domestic pets (dogs and cats) from new dwellings; the introduction of over 8,000 dwellings within the 400m-5km mitigation zone will give rise to over 19,000 human inhabitants (ONS 2.4 people per household).

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association (Veterinary Record 2010;166:163-168 doi:10.1136/vr.b4712 Authors: J. K. Murray, BScEcon, MSc, PhD1, W. J. Browne, BSc, MSc, PhD1, M. A. Roberts, BVM&S, MRCVS2, A. Whitmarsh1 and T. J. Gruffydd-Jones, BVetMed, PhD, MRCVS1) indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 8,000+ new homes), the cumulative impact of dog ownership (up to an estimated 2,500 new dogs and 2,000 new cats within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase.

NAG objects to the lack of direct measurable observations of the level of critical components of air pollution in the HRA
The HRA fails to present any actual evidence of current air pollution levels derived from roadside monitoring on critical routes within the 400m-5km TBHSPA mitigation zone (e.g. A324, A320, A321, A323) so as to set an acknowledged and proven base line from which to measure future incremental impacts on air pollution from the proposed housing developments and associated traffic movements; the introduction of associated vehicle ownership with its potential to increase NOX and CO2 in the 400m-5km mitigation zone; and over 10,000 vehicles (ONS 1.25 vehicles per household) in the 400m-5km mitigation zone

"Section 10.4 Only mathematical modelling of air pollution has been carried out. There has been no physical evidence collected on the main feeder routes so there is no actual physically measured base level on which to judge neither the current nor incremental air pollution impact in the 400m-5km mitigation zone."

Simply modelling air pollution and declaring the model output as actual air pollution levels is irrational and non-sensical. Physical measurement must be carried and the evidence presented for further public consultation.
If applied to the human population, it has been estimated that sources of automotive air pollution account for approximately 5% of premature deaths (The WHO’s health risks of air pollution in Europe (HRAPIE) report put the equivalent mortality increase for NO2 at 5.5%) and among the 19,000 new inhabitants proposed in the this Local Plan in the 400m-5km TBHSPA mitigation zone this represents a premature death incidence over time of some 1,000 individuals.

NAG objects to the lack of detailed assessment of 50% of all proposed Policies and 77% of sites under the Impact Pathways in advance of policy formation

Under the Sustainable Employment Sites (Policy E1) the following sites require special site level HRA but no attempt is made to evaluate this in advance to advise policy formation.

? Office (B1a) and R&D (B1b) Strategic Employment Sites (1 out of 6 sites)
  o Pirbright Institute

? Industrial (B1c, B2 and B8) Strategic Employment sites (2 out of 10 sites)
  o Lysons Avenue, Ash Vale
  o Henley Business park, Normandy

? District Centres (Policy E8) (3 sites)
  o Wharf Road, Ash
  o Station Parade East Horsley
  o Ripley

? Local Centres (Policy E9) (14 sites)
  o Aldershot Road, Westborough
  o Collingwood Crescent, Boxgrove
  o Kingpost Parade, London Road, Burpham
  o Epsom Road, Merrow
  o Kingfisher Drive, Merrow
  o Madrid Road, Guildford Park
  o Southway, Park Barn
  o Stoughton Road, Bellfields
  o The Square, Onslow Village
  o Woodbridge Hill, Guildford
  o Woodbridge Road, Guildford
  o Worpleston Road, Stoughton
  o Ash Vale Parade, Ash
  o The Street, Tongham

? Rural Local Centres (Policy E9) (3 out of 6 sites)
  o Bishopsmead Parade, East Horsley
  o Effingham
  o Fairlands, Worpleston

? Site Allocations within 400m-5km mitigation zone (40 out of 43 sites)
  o Guildford Town Centre
  o Sites A1-A8, A10-A12 (11 out of 12 sites)
  o Guildford Urban Area
  o Sites A13-A20, A22-A26
  o Ash & Tongham (3 out of 5 sites)
  o Previously Developed Land in the Green Belt (3 sites)
The HRA states "7.2.5 Due to their close proximity to the SPA (or the potential for developments in such close proximity to be facilitated by these policies), the above proposed policies/locations have potential to result in dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff during both construction and operation. Projects within 400m of the SPA that are to be brought forward under these policies will therefore need to be accompanied by Habitat Regulations Assessment that will investigate these impacts in detail."

“These impact pathways cannot be investigated in detail at the Local Plan level as they are related to detailed design and construction method."

This statement is an avoidance of more detailed consideration of environmental impacts in the construction and operational phase of each site in order to permit residents more appreciation of the impacts. If AECOM can model supposed air pollution levels then AECOM can model the impact of dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff during both construction and operation. GBC have failed to undertake suitable briefing of AECOM and have failed to take account of potential environmental disruption in advance of policy formation.

NAG proposes that to remedy these failings the final sentence of paragraph 7.2.5. should read

"These impact pathways will be investigated in detail at the Local Plan level by using appropriate modelling to illustrate the environmental impact of each site during construction and operation. The methodology and assumptions of the model proposed shall be available for public scrutiny. The resulting model output shall report on the following parameters; dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff; and be prepared in advance of the Regulation 19 Examination in Public and submitted as part of the Guildford evidence base for the Guildford Local Plan, Proposed Submission."

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

Attached documents:

I am writing to register my STRONG OBJECTION to the proposed Local Plan for the following reasons:-

- **SHMA.** I am appalled that the SHMA figure of 693 new houses per annum has not been scrutinised or checked by GBC. This number is crucial to the development of the entire Plan, yet the Council appears to have accepted without question an assessment prepared by "independent" consultants whose principal activities are working with and for developers. This number is over 100% more than the figure of 322 new houses which GBC fought to retain just a few years ago and G L Hearn should have been interrogated as to how they arrived at such an inflated number. It is a matter of concern that the Council have complacently accepted as many as 693 new houses every year. In particular, the projected student accommodation needs should 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:** PSLPA16/1684  **Respondent:** 8837313 / Maria Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The "objectively assessed need" figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan. The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

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**Comment ID:** PSLPA16/25  **Respondent:** 8838337 / Gregory Webb  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. I OBJECT to the evidence used by GBC to support the Local Plan. GBC has not taken into account the 2015 ENLA which shows an 80% reduction in employment space from the previous ENLA carried out in 2013.
   1. The industrial space at Burnt Common is therefore no longer needed

2. I OBJECT to the way in which foreign student numbers have been used to inflate the housing need in the 2015 SHMA.
   1. The 13,860 required homes in the local plan is exaggerated
2. If the population grows by 20,000 in the plan period that equates to 8000 homes based on average of 2.5 people per home

1. I OBJECT to the fact that GBC’s Transport Assessment was not available to councilors for the critical vote taken on 24th May this year. It was only published on 6th This consultation should not have been allowed to progress without this key information being made available to councilors. Nowhere near enough consideration has been given to the extra load being placed on infrastructure by 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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<th>Comment ID: PSLPA16/689</th>
<th>Respondent: 8839521 / Lynn Yeo</th>
<th>Agent:</th>
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I OBJECT to the evidence base used to develop the Local Plan, specifically, the inflated housing numbers in the Strategic Housing Market Assessment.

GBC has not released the methodology for how the housing number published in the SHMA was arrived at. It appears that the number of foreign students has been wrongly used to inflate need (most foreign students return to their country of origin after their course of study as they do not have automatic right to remain in the UK). If the population is expected to grow by 20,000 in the plan period, that would result in a need of approximately 8,000 homes (based on 2.5 people per home) rather than the 13,860 proposed by GBC in the Local Plan. The level of housing need has been exaggerated.

I OBJECT to the lack of consideration for infrastructure overload in the Local Plan.

GBC’s Transport Assessment was not even available to councillors before the vote taken to approve the current draft of the Local Plan. It was only published several weeks after the draft of the Local Plan was approved. The pressures placed on infrastructure by the developments proposed in the Local Plan have not been given adequate consideration. This will severely affect the quality of life of existing and new residents and it is highly irresponsible and unprofessional to develop a Local Plan without appropriate medical, education and transport infrastructure in place.

I OBJECT to the expansion of employment space in the Local Plan.

The Employment Land Needs Assessment 2015 shows an 80% reduction in employment space from the previous ELNA carried out in 2013. This means that the addition of new industrial spaces, such as at Site A43, are not needed.

I would like the Inspector to see my comments.

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

Attached documents:

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<th>Comment ID: PSLPA16/3064</th>
<th>Respondent: 8839553 / David Burnett</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3272  Respondent: 8840033 / Jimmy Daboo  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/1750  Respondent: 8840161 / Richard Ayears  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Following my read of the Draft Local Plan I wish to make the following comments :-

1. I object to the SMHA figure of 693 as this is a significant over estimation of the local need and includes a vastly over allowance for growth, unnecessary inclusion of Surrey University accommodation requirements (these are for the University to deal with as commercial development) which should not be part of the SMHA. The GBC SMHA should be completed again by a different consultant as a means of checking the calculations are correct.

2. I object to the lack of constraints being applied to the SMHA figure when the borough contains such high percentages of Green Belt and AOB. The NPPF provides guidance on applying constraints yet this does not appear to be taken into account during the work to produce the SMHA and the subsequent OAH figure.

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

I trust that these objections and supporting statements will be fully considered and that the Local Plan is amended with immediate effect. Please can I have acknowledgement of receipt of my comments.

I object to the lack of constraints being applied to the SMHA figure when the borough contains such high percentages of Green Belt and AOB. The NPPF provides guidance on applying constraints yet this does not appear to be taken into account during the work to produce the SMHA and the subsequent OAH figure.
I support GBC’s desire and work to produce a new Local Plan as I feel it is needed to guide future growth and migration, provide homes and employment for local people and ensuring a vibrant community however this iteration is based on a flawed SMHA that has been put together by a consultant that has looked at everything at its highest end and that no constraints have been exercised. The borough has seen over the last ten years a growth rate of around 250 per year yet this SMHA nearly trebles the numbers which I challenge.

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

Attached documents:

Comment ID: pslp173/611  Respondent: 8840161 / Richard Ayears  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

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/annum as no constraints have been applied – the GL Hearn methodology has compounded past errors in international migration forecasts and the whole SHMA needs to be re-visited and corrected as a matter of urgency.

I object to the continued use of the Green Belt and Countryside study as part of the evidence base. It is a subjective and inconsistent document that pays no regard to the impact of the current proposals on the setting of the AONB for example.

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

Attached documents:

Comment ID: PSLPA16/1795  Respondent: 8840193 / David K Reynolds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

There is major concern re housing numbers. The electorate have a right to know how the figures were generated for the SHMA and why they were further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for the borough.

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

Attached documents:

Comment ID: PSLPA16/3360  Respondent: 8840193 / David K Reynolds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

- We 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 is more than double the figure used in previous plans.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1681  Respondent: 8840257 / Nicola Theo  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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.

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

Attached documents:

Comment ID: PSLPA16/1867  Respondent: 8840897 / Clive Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to the excessive and unsustainable growth of development proposed that would spoil the attractive character of the Borough and where the infrastructure is insufficient to support it. The Plan should not propose to meet the unreliable forecast figure in the SHMA but take a more balanced approach as set out in paragraph 14 of the NPPF so as to reduce the release of Green Belt land for development.

Further, the Sustainability Report only seeks to support the proposals in the Plan and does not properly appraise the proposals by questioning whether they are appropriate from a sustainability aspect. If it did it would more likely support a lower housing figure as being more sustainable.

Support for the deletion of the previously proposed 174 dwellings off Chinthurst Lane and welcome for the Council's recognition of the serious harm the development would cause to a protected landscape and traffic/pedestrian conflict in the lane.

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

Attached documents:

Comment ID: PSLPA16/4453  Respondent: 8843361 / Adrian Atkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Let’s take a step back and look at the bigger picture. The plan is to plan for the sustainable development needs of the borough. Now, given that the borough is a physically constrained being a gap town set in the Surrey Hills AONB with 89% of land in the Metropolitan Green Belt. Large parts are affected by the Thames Basin Heath Special Protection Area.
There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the ‘downs’ seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. Any right minded person, when reading the NPPF as a whole would have to conclude that, given this helicopter view, the housing target has to be lower than an “objectively assessed need” if there are valid constraints. It is perverse and “policy on” that GBC have failed to apply any reduction in the OAN. Any reasonable person has to conclude that the plan will be undeliverable and unsound as a result. Each element has been treated in isolation with no regard to the cumulative impact; it is a bunch of players but not a team capable of winning the cup. Despite warnings and advice from bodies and public, GBC have taken the SHMA as correct but I and others consider it flawed. They have refused to truly understand the drivers of that SHMA and satisfy themselves the numbers are correct.

A key infrastructure constraint on the borough and its wider environs is the A3. The application of constraints to housing need in this borough is a sensible and practical approach to development within the borough. Guildford have done this in the past and is also what its neighbouring local planning authorities have done. Ministers have been clear that the Green Belt, for example, is afforded the utmost protection which has not been diluted. Green fields are needed to temper the inevitable increased flooding which will occur in the borough. However, GBC have strategically decided to ignore the NPPF, Ministerial statements and letters and National planning Guidance. Where this decision has been made and on what basis is not clear—there is no explanation and has not been debated in council. For that reason I question the soundness of the plan.

Given the sensitivity of the area, the level of proposed development, the sheer number of people opposing the plans for the last 3 years, the constant changes in leadership and officers of Planning at the Borough, the scale of the housing number proposed in this plan increases the need for the plan to be found beyond doubt to be sound. I cannot understand why, and there is no evidence supplied, GBC have failed to rigorously apply the policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents. This against planning guidance of brown field first. The plan for the town centre is a plan of the past, the failed planning decision of 1990’s/00s. The world is changing but this plan does not reflect that. Current trends in terms of property development such as the marked decline in town centre shopping centres in the last few years is only going to accelerate; people want experience not expanse. Guildford is just expanding the shopping area for no reason and not supported by evidence or trends, missing alternative opportunities to use the urban brown field sites for more needed causes such as developing sustainable, residential uses close to transport hubs and jobs of the town centre.

**EVIDENCE BASE**

I object The evidence base is not up to date or adequate.

The SHMA is inadequate and has been shown to be over inflating the numbers by flaws in the methodology as shown by Cllr Reeve, Guildford Society and Guildford Residents Association and by NMSS.

The Settlement Hierarchy - still has errors.

There is no evidence base or even a statement of a view to support the claims of Exceptional circumstances – this is so fundamental to the plan and the two consultation process both Reg 18 and 19. No exceptional circumstances have been proven/suggested. Neither were they present in Reg 18 either. The current Joint SHMA inflates the proposed housing figure and is clearly a “policy on” dossier to prove a pre-determined trajectory. The key reasons are: the failure to correct for errors in the historical data for international migration flows, the way it considers students and affordability the flaws in the method for estimating the number of homes needed to support job growth the treatment of vacant property The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions. There are no Exceptional circumstances given to justify amendments to Green Belt boundaries as part of the Local Plan process. The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready.
for a Regulation 19 consultation. It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g., Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses. The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points. Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed. No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods. Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach. The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but underestimates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (e.g., closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions. The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space – the document is dated, includes retailer not looking for space in Guildford, ones who already have them (e.g., Majestic Wine) and retailers who are not looking for retail expansion – 2-5 years is a long time in retail. But the macro trends and evidence are ignored. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The pollution evidence is so scant – leaving it in the hands of developers to assess the impact is wrong. It’s like allowing retailers to vote for Christmas and ignore the Turkeys. It is wrong to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. We are only just understanding the nature of premature deaths due to pollution coupled with the car emission scandal it is negligent in the way the GBC have treated this area.

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

Attached documents:
The overall number of new houses per year that Guildford Borough Council claims are needed in the borough (693) has been challenged by NMSS in a recently commissioned review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford. The review shows that the true number should be 510 homes per year over the period 2013 to 2033.

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

Attached documents:

Comment ID: PSLPA16/1343  Respondent: 8846849 / David Berliand  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 as has been far from transparent and indeed is more than double the figure used in previous plans.

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

Attached documents:

Comment ID: PSLPA16/713  Respondent: 8848033 / Paul Gerrard  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Habitat Regulations Assessment (HRA) Screening (2013, 2014 and 2016)

2016 is mentioned in title, but link only seems to refer to 2014 documents for the 2014 Draft Local Plan, which are presumably out of date.

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

Attached documents:

Comment ID: PSLPA16/538  Respondent: 8850465 / Colin Chandler  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

> These figures of increased population and therefore an increased need for housing were based on population projections that were out of date and inaccurate and which massively overestimated Guildford Boroughs population growth. Indeed, now that we are leaving the EU, they'll clearly be less pressure on housing, reducing the need for development.
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

First, the basis of the Plan is based on a Strategic Housing Market Assessment. This was, I understand, generated by a consultant's mathematical model. The parameters of the model together with the key assumptions made are not revealed in the Planner have they been revealed to Guildford Borough Council (G.B.C.). The target housing number produced by the model has been further increased by G.B.C. to a level which is 70% higher than the official national estimates for population growth in the Borough.
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

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

Attached documents:

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The "objectively assessed need" figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1511  Respondent: 8856033 / John Turner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. I object to the lack of any evidence of the alleged housing need numbers

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

Attached documents:

Comment ID: PSLPA16/3141  Respondent: 8857537 / Tony Heaney  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I write to strongly object to many of the proposals in the latest Guildford Borough Local Plan 2016. Specifically I object to:

1. The basis on which the number of new houses needed is calculated. The SHMA remains deeply flawed and lacks transparency. The modelling basis used by the consultants is not known to either the public or the Borough Council. In consequence the estimates for housing appear to be inflated significantly out of line with national population growth figures. This has led to proposals for a huge increase in the number of homes in and around the Horsleys which is distinctly out of proportion to proposals for other areas of the Borough.

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

Attached documents:

Comment ID: PSLPA16/4349  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The application of constraints to housing need is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities have done. Why have GBC not done so?

I object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent

Key parts of the evidence base are flawed or based on withheld assumptions.

The current SHMA inflates the proposed housing figure due to the following factors:
• the failure to correct for errors in the historical data for international migration flows,
• the way it considers students and affordability, and
• the flaws in the method for estimating the number of homes needed to support job growth
• the treatment of vacant property
• the lack of true consultation with bodies and persons who it is stipulated should be at the core of such consultation and development of the Local Plan such as Parish Councils, not for them just to be presented with a fait a commpli !

The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where has not been provided in time to inform Plan proposals or responses.

The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.

Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed. Buses are not the solution and frequency issues will result in additional car journeys. The suggestion that buyers of houses costing 750,000 to 2,000,000.00 will walk 40 minutes into town or cycle to get to work or go shopping are clearly ill conceived and unlikely to materialise.

No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods. The proposed new stations are not in the rail network plans for development rather the railways are looking at speeding up journeys such that additional stations are ruled out.

Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach. Traffic will be forced to use roads such as the Street in Compton, already exceeding EU air quality levels.

The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet
and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from Companies already in liquidation or with national requirements that exclude Guildford.

We believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

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

**Attached documents:**

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**Comment ID:** PSLPA16/3332  **Respondent:** 8858817 / Roger Chamberlain  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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.

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

**Attached documents:**

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**Comment ID:** PSLPA16/2512  **Respondent:** 8858881 / Stephen Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough which I believe is excessive (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

- The current SHMA inflates the proposed housing figure due to
  - failure to correct errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job

- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, which has doubled the figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base
and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/4196  Respondent: 8858913 / Stephen Carter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The Housing Need Figures on which the Plan is Based are Flawed

The Plan appears to be based on a misconception, and indeed erroneous calculation, of housing need. Before looking specifically at the figures, I would comment that the commercial background against which the Plan must be considered has changed since it was published. The effects of Brexit on the property market are already being seen. Demand for property is decreasing, both residential and commercial, as a result of which property agents are contemplating widespread redundancies. As of noon on 8 July 2016, Aviva, M&G, SLI, Henderson, Threadneedle and Aberdeen have, as a direct result of Brexit, suspended dealings in their UK property funds. More may well follow.

The designation of brownfield sites for commercial development in the Plan was already impossible to justify given the pre-Brexit oversupply of commercial property in the Borough (evidenced by an inability to sell/let it and vacant retail premises). This has been exacerbated by Brexit. The need for and viability of commercial development on brownfield sites is therefore illusory.

The obvious answer is, as it always was, to develop brownfield land for housing. If this were to take place, there would be no need for the debate as to housing on the Green Belt, since the requirement could be met without it. There is no arguable case for developing the Green Belt that would be compliant with the binding requirements of the NPPF.

Quite apart from the above considerations, no cogent argument or analysis has been put forward in any event to support the 13,860 new houses proposed. Even if that total were justifiable, I object in particular to 5,000 of those houses being designated over an 8 mile stretch between Wisley and Guildford, raising questions over the very conurbation that the Green Belt specifically exists to avoid.

Two reviews of the figures since publication of the Plan, one pre-Brexit and one post-Brexit, reveal them to be fatally flawed.

In June 2016, Mr Neil McDonald of NM Strategic Solutions ("NMSS") produced a report entitled “A Review of the West Surrey SHMA as it Relates to the Objectively Assessed Housing Needs of Guildford”. As you will be aware, Neil McDonald is a hugely experienced policy adviser to ministers, in particular in relation to planning policy issues in the Department of Communities and Local Government. This report places the failings of the SHMA and the local Plan into stark relief. I attach a copy and incorporate it into this objection by reference.
The NMSS review was carried out before the EU Referendum. It concluded that the housing need for the Borough would be 510 per year, not the 693 that forms the erroneous basis of the Plan. Accordingly, the Plan over-estimates the housing need by 36%. That over-estimation can only increase in the post-Brexit environment.

Over-estimation, the necessity of downwards revision following the result of the EU Referendum and the overstated need for commercial development are also highlighted in the July 2016 report produced by David Reeve, a Guildford Borough Councillor, entitled "A Review Of The Guildford Objectively Assessed Housing Need". A copy of that report is also attached and incorporated into this objection by reference.

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

Attached documents:  Neil McDonald report.pdf (1.6 MB)  David Reeve report.pdf (172 KB)

Comment ID: PSLPA16/2445  Respondent: 8859553 / Clare Bevan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

5. 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.

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

Attached documents:

Comment ID: PSLPA16/2959  Respondent: 8860161 / Pat Short  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need and numbers

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

Attached documents:

Comment ID: PSLPA16/2466  Respondent: 8862465 / Nik Church  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

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

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers.

However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I remain concerned about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree and hence object to the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics, ONS, projects a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this discrepancy may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, SHMA, which looks at how the annual housing target of 693 homes is comprised. It estimates that:

- 517 homes per annum arise from ‘the demographic starting point’ – (The ONS and Department of Communities & Local Government, DCLG, predicted figure for Guildford based upon their population and household forecasts).
- 120 homes per annum (added in the SHMA), to ‘support economic growth’,
- 31 homes per annum are built-in to ‘improve affordability’
- 25 homes are included due to ‘student growth’,

All these elements total a target figure of 693 homes per annum. This appears to be poor ‘mathematics’ as economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough.

It would appear that GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

In addition to this I am concerned that the impression is conveyed that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections.

I object to this autarchic declaration of unnecessary borough growth where the only benefit might be the boroughs coffers.

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough, since this figure is too high and not supportable (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough. This is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/488  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:
18. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
   
   - The "objectively assessed need" figure of 693 homes a year is too
   - A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting
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   - failure to correct for errors in the historical data for international migration flows,
   - issues with the way it considers students and affordability and
   - flaws in the method for estimating the number of homes needed to support job growth.
   - It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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

Attached documents:
For West Horsley this is reflected in close to 40% increase in the number of houses within 3-5 years of a plan being adopted.

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

Attached documents:

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Comment ID: PSLPA16/1428  
**Respondent:** 8880385 / John Telfer  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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 "693 houses per annum" as a determinate of demand for development. This statistical source has been deliberately kept secret from council tax payers; as a consequence we have no confidence in these assertions and question the correct use of Council funds to pay for unaccountable Consultants when a planning department already exists.

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

Attached documents:

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Comment ID: PSLPA16/3562  
**Respondent:** 8880865 / Jane Paton  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The Strategic Housing Market Assessment provides inadequate evidence concerning the need for new housing in the borough. I refer you to the analyses carried out on behalf of Guildford Residents' Association and the Council for the Protection of Rural England and the review written by the Councillor for East Horsley, Mr David Reeve. All these analyses highlight very serious shortcomings which suggest that the housing need has been exaggerated. Moreover it appears that the Council has not carried out its oversight role of scrutinising this third party report and is not even in possession of the underlying demographic housing model.

The other documents in the evidence base are either out of date or unsatisfactory. For example the analysis in the Green Belt and Countryside study is not intellectually honest and seeks to justify an a priori conclusion that large parts of the Green Belt should be discontinued.

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

Attached documents:

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Comment ID: PSLPA16/1692  
**Respondent:** 8881345 / Lynne Ground  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

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

Attached documents:

Comment ID: PSLPA16/1693  Respondent: 8881345 / Lynne Ground  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/2760  Respondent: 8881537 / Jean Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/1003  Respondent: 8883489 / N & B Hinchliff  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7. The enormous number of houses proposed and how these figures were arrived at:

My understanding is that the inflated number of new houses proposed has come about as the result of a Strategic Housing Market Assessment (SHMA) that was generated by a consultant’s mathematical model which is not revealed in the plan, nor it would seem, to Guildford Borough Council. This SHMA target housing number is then further increased by Guildford Borough Council to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. For the Horselys the scale of this increase would produce alarming results – an increase of up to 35% in existing West Horsely households – greater than any other in the Borough.

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

Attached documents:

Comment ID: PSLPA16/1431  Respondent: 8883841 / Pamela French  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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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<th>Comment ID: PSLPA16/407</th>
<th>Respondent: 8886497 / Quentin Bradshaw</th>
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<td>• Now that we are to leave the EU, we should need fewer houses anyway. The Council should completely rethink the demand.</td>
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<th>Comment ID: PSLPA16/460</th>
<th>Respondent: 8886913 / Rosamund Bovill</th>
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<td>I should like to express my concerns in regard to some of the issues raised in the Plan.</td>
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<td>1. Housing requirements. The Plan is based on growth predictions which have been acknowledged to be incorrect. Surely this should be the basis for a strategy which should also identify housing requirements ie how many and what type eg single person dwellings, family homes, starter homes, single storey etc. The proposed density of the developments proposed in the Horsleys are much higher than the average for the area which would be out of keeping and put a huge strain on the local facilities. They are also on flood plains and would be a strain on the sewage systems which are already inadequate.</td>
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<th>Comment ID: PSLPA16/2698</th>
<th>Respondent: 8886945 / Brian Osborn</th>
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I do not agree that the Local Plan is sound, that the evidence base is up to date or that the plan is legal compliant for the following reasons:

1). GL Hearn’s Strategic Housing Market Assessment (SHMA) proposes building 693 Dwellings Per Annum (DPA). However representations made by Tibbalds Planning and Urban Design consultants on behalf of Send Parish Council illustrate that this number accounts for a buffer of more than 20%. In reality this means allocations are made to provide 910 Dwellings Per Annum (DPA) or 131% of the requirement of the SHMA. The housing figures in the SHMA are therefore inaccurate and unreliable.

2). Guildford Borough Green Belt and Countryside Study is tailored around the Settlement Hierarchy Report and the Strategic Housing Market Assessment Report (SHMA). The Settlement Hierarchy is based on a subjective spatial strategy of large/medium and small villages. With regard to the SHMA, I have detailed my concerns as in point 1 above.

3). Guildford Borough Green Belt and Countryside Study is used to rule out sites in GBC Flood Risk Sequential and Exception Test (May 2016) but these sites would otherwise meet the GBC Flood Risk Sequential and Exception Test (May 2016). See Appendix 1 stages 1, 2 and 3.

4). Guildford Borough Council’s Surface Water Management Plan (SWMP) was produced prior to the approval of planning application 14P02289: Land to the north of Tannery Lane and east of Wharf Lane. This planning application required a drainage strategy to mitigate surface water. This development borders site A42 Clockbarn Nursery. As the SWMP preceded approval of this planning application the SWMP it is now outdated as an evidence base document to manage flood risk as required by the NPPF- with regard to A42 Clockbarn Nursery.

5) Each and every site in Send Parish has been added since the Regulation 18 consultation, including a major development of 400 homes at Garlick’s Arch and on/off slip roads on to the A3.

6) The introduction of Garlick’s Arch and on/off slips roads on to the A3 have been added so late within a Regulation 19 document that statutory consultees such as Highways England have not had a chance to comment.

7) The Transport Assessment was provided during the consultation period and was not available to inform Councillors at the full Council meeting on the 24th May 2016.

8) Councillors have not been able to scrutinize all documentation, including the OAN figure for the SHMA.

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

Attached documents:

Comment ID: PSLPA16/1209  Respondent: 8888289 / Hazel Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

My greatest underlying concern is the doubt that the figure for the calculation of the number of new houses required, taken from a Statistical Housing Market Assessment (SHMA) and not made available for consideration by the general public may be incorrect. Furthermore, this initial figure was increased by GBC for some reason. If the calculations for the basic premise for the GBC’s submission are flawed it makes a nonsense of everything we are considering.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
GBC has refused to publish the SHMA report which they are using to substantiate their figures and borough Plan, this prevents any proper consultation. The current SHMA figures being used by GBC have not been scrutinised to ensure they take in correct data or residential & infrastructural models.

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

5. I OBJECT to GBC's SHMA report as the figure of 693 houses per annum is approx. double of any previous figures and in light of BREXIT can no longer be a valid model to use for drafting the local plan.

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? ( )

Worplesdon Parish council's response to Guildford Open Space, Sport and Recreation Assessment 2016-2033

1.2.2 Scope of study and objectives

Does this assessment include common land?

• Guildford is Surrey’s most populated district approx 141,009 residents.
• ½ of the population lives in the town.
• Four major roads through the borough.
• Population of Worplesdon 8529 residents.

3.2.1 National Policy Framework

Paragraph 75 Surrey County Council is responsible for maintaining rights of way, which is a discretionary service. Who will pay to maintain these rights of way?

3.2.2 Green Infrastructure

A network of multi functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. This is what we currently have.

3.2.3 The Natural Environment White Paper (NEWP) The Natural Choice: securing the value of nature (2011)

Recognised that a healthy natural environment is the foundation of sustained economic growth, prospering communities and well being. It sets out how the value of nature can be mainstreamed across our society by facilitating local action; strengthening the connections between people and nature; creating a green economy and showing leadership in the EU and internationally.


This builds upon the above paper National Biodiversity Policy to implement international and EU comments. By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed and sustainability and be more resilient and able to adapt to climate change providing essential services and delivering benefits for everyone.

The mission of this strategy is to halt overall biodiversity loss, support health well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefits of wildlife and people.

1. Habitats and ecosystems on land(including freshwater environments)

By 2020 measures will have been put in place so that biodiversity is maintained and enhanced, further degeneration has been halted and where possible, restoration is underway, helping deliver more resilient and coherent ecological networks, health and well-functioning ecosystems, which deliver multiple benefits for wildlife and people.

1. Marine habitats, ecosystems and fisheries

This will help to deliver good environmental status and our vision of clean, healthy, safe productive and biologically diverse oceans and seas.

1. Species

By 2020 there will be an overall improvement in the status of our wildlife and will have prevented further human-induced extinctions of known threatened species.
1. People

By 2020, significantly more people will be engaged in biodiversity issues, aware of its value and taking positive action.

- *If trees are planted at Russell Place farm it will significantly alter the biodiversity which included field fares. These birds require large open spaces.*
- *The proposals for the Local Plan appear contrary to the aims of these strategies.*

3.3.2 Local Plan 2003

Secretary of state for Communities and Local Government gave a direction in 2007 that the 2003 GBC Local Plan policies be saved and remain in effect, with the exception of

H1 housing provision

H10 New residential development

S1 Major new retail development

GT4 Seeboard site, Woodbridge road

RE7 Protection of the best and most versatile agricultural land

HE11 scheduled ancient monuments and other sites and monuments of national importance

U1 University of Surrey

The Local Plan Aims - To promote development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

1. Maintain and provide for a range of Good Quality Housing, Affordable by All Residents Throughout the Borough
2. Support, maintenance and Renewal of the Local Economy
3. Protect and Enhance Guildford’s Town Centre Role as a Regional Shopping Centre and as a Focal Point of Commercial, Arts, Cultural and Entertainment Facilities
4. To Protect and Enhance the Quality of the Urban and Rural Environment
5. Reduce the Demand for travel by car
6. Make the Best Use of Scarce Land Resources Minimising the Impact of Development on Greenfield sites.
7. Encourage and Facilitate Access for all People to all Buildings
8. Recognise the importance of Local Communities Within the Borough by Promoting Local Identity and the Provision of a Wide Range of Facilities at the Local Level
9. To Protect the Countryside from Inappropriate Development and Maintain It’s Open Rural Character
10. Support the Provision of High Quality Recreational, Tourist and Community Facilities in the Borough.

3.3.3 Corporate Plan 2015-2020

Vision: Guildford (as a town and rural borough) will be the most desirable place to live, work and visit in the South East England. A centre for education, healthcare, innovative cutting edge businesses with high quality retail and wellbeing. A county town set in a vibrant rural environment which balances the needs of urban and rural communities alike. Known for our outstanding urban planning and design, and with infrastructure that will properly cope with our needs.

*TRAFFIC!* Working with partners to deliver the massive improvements needed in the next 20 years, including changes to tackle congestion issues.

3.3.4 Play strategy (2016-2021)
The importance of play in natural outdoor spaces is highlighted, with research emphasising physical benefits, mental health benefits, social benefits; risk awareness and improved behaviour. This is welcomed.

3.3.5 A vision for Guildford’s Countryside DRAFT (2016)

Vision Statement:

Guildford Borough Council aims to manage its Countryside estate to maintain and enhance its landscape, natural capital and ecological value to continue providing benefits for future generations.

We will work in Partnership with residents and organisations to improve sustainability and to PROTECT OUR COUNTRYSIDE, whilst balancing this with the needs of the rural and wider economy.

Guildford’s natural environment and landscapes will form part of the overall provision of Surrey’s ecosystem services, creating a coherent network, for people, recreation and wildlife, through supporting the implementation of traditional management.

The vision statement will provide a framework to enable proactive management of Guildford’s Countryside and development of appropriate action plans for site management. The importance of partnership working is highlighted, and existing local partnerships and initiatives are set out within the document. This is all welcomed.

Page 21 Guildford Borough Councils Countryside sites contribute to the Government’s Environmental White paper

Habitats enhanced

SSSI in favourable ecological condition

River Wey catchment is clean, valued and ecologically functioning river catchment area.

Outdoor Recreation resource for sustainable Thames Basin Heath SPA to ensure visitor pressure does not damage what we have.

It states that SANG reduces pressure on SPA but what evidence or proof is there to support this.

Page 22

The Surrey Nature Partnership has produced advice to those involved in planning to ensure that development within the county protects and enhances biodiversity. Through this the aim is to also help local authorities honour their statutory ‘Biodiversity Duty’ under Section 40 of the Natural Environment & Rural Communities Act, 2006. The document describes protected sites, habitats and priority habitats and species.

3.3.7 Biodiversity Opportunity Areas: the basis for realising Surrey’s ecological network Guildford Borough (Policy Statements Prior to 2012), the Surrey Biodiversity Partnership implemented the Surrey Biodiversity Action Plan. The Partnership has now become the Biodiversity Working Group of the Surrey Nature Partnership and it is producing Biodiversity Opportunity Area Policy statements to align with the outcomes in Biodiversity 2020. The aim of Biodiversity Opportunity Areas (BOAs) is to establish a strategic framework for conserving and enhancing biodiversity at a landscape-scale, making wildlife more robust to changing climate and socio-economic pressures. BOAs are those areas where targeted maintenance, restoration and creation of Natural Environment & Rural Communities (NERC) Act ‘Habitats of Principal Importance’, i.e. Priority habitats will have the greatest benefit towards achieving this aim.

BOAs

TBHO4: Ash, Brook wood and Whitmoor Heaths

ND01: North Downs Scarp, The Hogs back

R04: River Wey and tributaries
3.3.8 Naturally richer: The Surrey Nature Partnership have developed A Natural Capital Investment Strategy for Surrey. This document as the beginning of an important initiative – to plan and coordinate collective investment in the natural environment of Surrey to:

- ensure that the natural environment continues to provide multiple benefits into the future.
- future-proof the county against current and future risks such as climate change and extreme weather events.
- help build a prosperous and secure future for everyone who lives and works in Surrey.
- demonstrate that an innovative approach to natural capital at the local level has to happen.

Sustainable land management

- Halt losses of natural capital- we will strive to halt loss and degeneration across the capital through positive management, habitat restoration and re-creation.

Smart economic growth

- Grow Surrey’s intelligent, networked, innovative economy as the best place in the UK to do business in a sustainable location.
- Supporting the creation of jobs – we will promote a healthy attractive environment which enhances the desirability of Surrey for business.
- Developing skills – we will support the development of skills to enhance natural capital investment and management as part of a wider approach to sustainable growth.
- New space for business and local government – we will support the development of new business models and opportunities to provide multiple partnership benefits.

The reduction of risks (for example pollution, flooding) will be targeted and the enhancement of benefits, improving opportunities for exercise, recreation and mitigating the impacts of climate change.

3.3.9 Thames Basin Heaths Special Protection Area Avoidance Strategy (2009-2016)

3.3.12 River Wey Catchment Implementation Plan

The main issues that are a priority for the Wey catchment are phosphates from point source pollution and diffuse pollution and physical modification due to wiers and other obstructions. Two issues are invasive non native species and urban development.

3.3.11 Rights of Wey Improvement Plan for Surrey

Surrey transport plan. This is the first revision of the 2007 Right of Way Improvement Plan. This would lead to improved connectivity and rights of way to bridleways and to reduce severance. One objective of the plan is to increase the accessibility of the network for all users including blind, partially sighted and mobility difficulties, assess every improvement on the basis of “least restrictive access”. This is welcomed.

- Local Needs Assessment

Consultation and research programme March/April 2016.

- How many households were consulted? What do the % responses represent?

4.3 Neighbouring local Authorities and Parish council’s key findings. (Duty to co-operate). The duty to co-operate is a government policy, how successful has this been?

4.4 Stakeholder –Key Findings

Guildford Borough Council provides 2,600 acres of land including 7 Green Flag parks and open spaces, 61 play areas, 13 MUGAs, 2 skate parks, 1 BMX, 9 outdoor gyms, mini golf and table tennis. Bowling greens, netball and tennis.
WPC believes that there is an overall sufficient recreation space but there is deficiency in sports pitches to accommodate demand at that town centre space is limited. While access to open space is generally good, access to some sites could be improved. The availability of parking and poor public transport are the major issues.

Ash, Stoke and Westborough are the Council's public health target areas having higher rates of smoking, biggest difference in life expectancy etc. These are areas where increased physical activity would have most impact, and hence the ones that the council should focus on.

4.4.5 Countryside site

- Nature reserves are very popular with 140 visitors a year to each reserve.
- Pressure on town centres e.g. Pewley Down
- Forest schools are in such high demand their use needs to be restricted.
- Conflict between user groups. Pedestrians, cyclists and equestrians.

The delivery of Suitable Alternative Natural Greenspace (SANG) is key in order to mitigate the impacts of new developments/population growth on internationally important sites. This is accepted however SANGS must be located in the correct place, be directly linked to specific development and delivered through the planning process.

4.4.7 Rights of Way

Any new development should not impact on rights of way. Any mitigation needs to be identified and paid for through the s106 process. New development should identify and enhance the rights of way network.

4.4.8 Other issues and observations.

The cost of implementing the play strategy is anticipated to £1.2m. Is this sufficient to meet all objectives?

5.1.5 Natural Green Space

This does NOT include the proposed SANG, but does include part of Whitmoor common. What is the rationale behind this?

(Natural England) and the local consultation for this study have identified the value attached to such space for recreation and emotional well-being. A sense of ‘closeness to nature’ with its attendant benefits for people is something that is all too easily lost in urban areas. Natural Green Space can make important contributions towards local Biodiversity Action Plan targets and can also raise awareness of biodiversity values and issues.

Natural Green Spaces can form important ‘green corridors’ for both wildlife and people, especially when linked with the public rights of way network, cycle paths and rivers etc. These spaces form an important part of the Green Infrastructure of an area, and can be important in delivering ecosystem services and attracting visitors.

Large tracks of countryside used for farming are not accessible, however, there is an extensive right of way network which can improve accessibility.

5.1.7 Churchyards

These are Important in terms of biodiversity.

5.1.9 Private Space

Such as Loseley House and gardens and other properties that are open to the public

5.2.1

Table 7 does not appear to include common land. What does Accessible Natural Green Space include?
5.2.2 Provision in Wards

Table 8 this is incorrect. There are no allotments in Worplesdon.

Outdoor fixed sport. Worplesdon tennis courts have not been included

Appendix 2 Maps show all space including roadside verges

6.0 Quality standards

The recommended standards need to be robust, evidence based and deliverable through new development and future mechanisms of contribution through on site provision and the community infrastructure levy (CIL). This is welcome but how is this going to be monitored?

6.2 Allotments How many allotments in Guildford?

95% of all respondents from the household survey never use allotments, meaning this is the least used by type of open space and 32% of people felt there should be more allotments. What household survey was this, when was it undertaken and how many respondents were there?

The propensity for higher density new housing with smaller gardens is likely to increase demand.

If 95% of people have never used an allotment how can 45% of respondents comment on the quality of the allotments?

Quality standards for amenity green space.

The value of “amenity green space” must be recognised especially within housing areas, where it can provide important local opportunities for play, exercise and visual amenity that are almost immediately accessible.

On the other hand, open space can be expensive to maintain and it is very important to strike the correct balance between having sufficient space to meet the needs of the community for accessible and attractive space, and having too much which would be impossible to manage properly and therefore a potential liability and source of nuisance. It is important that amenity green open space should be capable of use for at least some forms of public recreation activity.

Recommendation for play areas.

These standards had been critised because they are often seen as undeliverable, and can result in proliferation of play areas that can be difficult to maintain, as well as setting unrealistic aspirations in urban areas where insufficient land is available to provide facilities, especially higher density development on brownfield sites.

6.6 Natural Green Space

This is recommended by Natural England and The Woodland Trust and is welcomed.

6.6.2

There is a requirement for new developments to provide amenity green space (SANGS), either on site or make a contribution to the local planning authority to create a SANG with the Borough. The Sang must be related to the development it serves. Natural Green Spaces excludes SANG.

Wherever possible sites should be linked to help improve wildlife value as part of a network and that trees are not always the answer to Biodiversity.
Given the lack of Accessible Natural Green Space in Ash and Tongham why was the SANG not proposed to be sited there and not at Russell Place Farm?

Do the SANGS include commons?

8.1.2. Delivering Strategic Options

Planning appears to be in a state of flux since NPPF 2012. Whilst the Local Authority will have an important role in delivering open space sport and recreation facilities their role may move from that of “deliver” to “facilitator”. The aim will be to work with community organisations to make local decisions about how facilities and services will be provided. Residents associations, voluntary organisations, sports clubs and societies will all have a key role in this. Whilst this is welcome, how will this be monitored and maintained?

8.2 Existing provision to be protected.

All open space should be afforded protection unless it can be proved it is not required. Whilst this is acceptable what evidence would be required for the protection to be removed?

Policy OS3 Recommendation- Sites which have significant nature conservation, historical or cultural value should be afforded protection, even if there is an identified surplus in quality, quality or access in that local area. This is welcomed.

Table 19

Worplesdon

The information contained in Table 19 is incorrect. What information was used to populate the table? The table needs to be updated to include at least

- 3 village Greens
- Harry’s Meadow
- Nevins Copse
- Jacobswell Rec,
- 9 commons,
- 8 play areas,
- Fairlands sports field
- Worplesdon memorial grounds
- Burpham court farm

This obvious missing information, could imply that other information/evidence is missing or incorrect.

Page 81 OS10 “Develop a pilot project within one of the settlements to develop a neighbourhood plan which incorporates green space planning.” This has been done for Burpham whose neighbourhood plan included Green Space.

Page 82 Capital and grant funding

Capital and grant funding has diminished in recent years, nevertheless funding does become available for providing facilities for open space, sport and recreation. National and governing bodies for individual sports should be consulted where new infrastructure is required, such as changing rooms and sports pitches. Environmental grants and stewardship schemes are available for managing natural green space. As neighbourhood plans are developed and open space priorities are established within these, funding requirements will be identified and delivery through grant funding can be considered.
If the need has been identified and the funding path is through grant applications, there is no guarantee that funding will be provided and hence delivery is not guaranteed. The need should have been identified and included in the CIL 123 list where developers would contribute. However this still does not guarantee delivery due to the economy, lack of development and the planning process.

New Housing

At the minimum new public open space will need to be required for new housing. The Local Plan aims to provide 13,860 new homes up to 2033. The new Local Plan is still subject to consultation and independent examination, and is therefore not yet finalised. Once finalised, the amount of open space required for the increased population can be calculated using the methodology set out in table 15. However, more space will need to be required to not only deliver the number of homes but the level of open space required. More of the countryside in Guildford would be lost to this sort of development. This implies that housing numbers, and hence open space requirement would need to be reduced. This appears to be contrary to the proposed policy on protecting the Green Belt.

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 figures used for justifying the number of new houses in the SHMA are spurious at best but in the light of the Government’s recent proposals on population the whole scheme should now be shelved. The current organic growth of the area works reasonably well when controlled properly by the Planning Department in line with national policy.

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

Attached documents:

Comment ID: PSLPA16/1181  Respondent: 8892673 / Nick Forwood  Agent:

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

16. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, I also understand that it is based on ‘commercially confidential’ modelling assumptions that cannot be checked, reviewed or audited independently. I note that there has been no transparency to this evidence base and it is therefore impossible to assess its accuracy. I firmly believe that this has been conducted in an undemocratic fashion and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that all my objections made above are fully taken into consideration and that the Plan is withdrawn.

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

Attached documents:

Comment ID: PSLPA16/2203  Respondent: 8892737 / David Eagle  Agent:

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
• failure to correct for errors in the historical data for international migration flows,
• issues with the way it considers students and affordability and
• flaws in the method for estimating the number of homes needed to support job growth.

- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1218</th>
<th>Respondent: 8893697 / Gill Woolfson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>()</td>
<td>is Sound?</td>
</tr>
</tbody>
</table>

The NPPF 109 refers.

THE EVIDENCE BASE

You ask if the evidence base is adequate, up-to-date and relevant. I have objections to parts of the three documents below.

In the GBC Transport Strategy I object to:

Local Roads Network Strategy.

Major external developments have not been sufficiently accounted for, leading to flaws in the strategy on Local Roads in the West of the Borough. The AUE, 3,850 homes, and PRB, 1,200 homes, are already under development and significant traffic flows to and from Guildford will result. The AUE is predicated on many residents using the car. Local Roads affected will be the A323, A331, B3411 and also the A31. To this is to be added 1,300 homes in Ash and 1,100 in Normandy. The effect on these local roads will be severe.

The new bridge at Ash level crossing on the A323 is welcome, but will not resolve the problem of delays on the A323, which is operating at close to capacity. Other improvements to the A323 and to Westwood Lane are insufficient and delivery is too late. Judging from the sum to be spent, £6.6m, improvements will be minor. LRN9 -LRN 13 and LRN 18-LRN19 will deliver improvements between 2017 and 2026. The A323 is especially vulnerable, being a narrow A road with no opportunity to widen it along its length. Large queues will form at peak time at junctions and obstructions such as bus stops. The planned improvements will be delivered well after the first commuters travel from the AUE and PRB to Guildford.
GBC has not produced a strategy that deals with the quantum leap in commuters from the new developments in West of the Borough and external developments.

More Information in Annex A

BT4 Delivery 2021-2022. Funding TBC.

Significant bus network serving the Land to the south of Normandy and to the north of Flexford site and key destinations including Guildford and the Blackwater Valley to be provided. Given that the roads that these services would use are already operating over capacity, and very minor improvements, not guaranteed, are planned, I cannot see that this bus network would be effective at peak times.

AM4 delivery 2020 - 2024.

The Christmas Pie Trail runs from Wood Street to Farnham. The surface is unmade and unlit. It is muddy in winter and narrow where it passes through woods. There is little scope for lighting and improving the surface at the Wood Street end, as it runs through the Broad Street and Backside Commons, which is an SNCI. Much of the trail runs through fields away from sources of electricity, so lighting the trail would be expensive and would pollute an otherwise dark area. It is unsuitable for year round travel.

I object to the housing target in the SHMA

I would have liked to have been able to understand how the housing target is calculated, especially as the number is greatly in excess of previous Plan's targets. I accept that the owner of the model that calculates housing need wishes to protect their intellectual property. I do not believe that GBC should accept the findings of the model just because other Authorities have. I would have liked to have seen the input that GBC submitted for the model, and a summary of the test scripts run by the developer to show that the model delivers correct results.

To what extent have GBC engaged with Rushmoor and Surrey Heath? The AUE is 500m from the Guildford border. Have the AUE and PRB been taken into account when calculating the housing numbers, especially as they are intended in part for people who work in Guildford?

I object to the flawed nature of the Settlement Hierarchy and Settlement Profiles in respect of Wider Normandy

Wider Normandy is made up of five/six hamlets, of which Normandy is one.

The Settlement Hierarchy and Settlement Profiles;

- Confuse Normandy with Wider Normandy
- Ignore two of the hamlets, Willey Green and Pinewoods
- Consider Flexford to be part of Normandy, although they have been informed that this is not the case
- Consider Normandy and Flexford as being one settlement when it suits their case, and as two when the opposite is true
- Claim that Normandy would benefit from shops, with no proof. We are avid internet shoppers. How up-to-date is any evidence that GBC are using? Is it pre-superfast Broadband?
- There are 10 errors/omissions in the Settlement Profile for Normandy/Flexford. For example; GBC state that we have one SNCI to the north of Normandy when there are five; a Scheduled Ancient Monument which lies partly in Flexford is omitted.

More information in Annex B

I object to the lack of a Heritage Strategy
English Heritage requested that GBC produce a Heritage Strategy. There is a draft document "Historic Environment Information" April 2016, which is not available in the Evidence Base. The Plan was put together without information on GBC's Heritage Assets being available. Nor have residents been able to comment on it.

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

Attached documents:

Comment ID: PSLPA16/1221  Respondent: 8893697 / Gill Woolfson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

ANNEX A

GBC Transport

LRN 9 - LRN 13 and LRN 18 - LRN 19, improvements to the A323 and to Westwood Lane are insufficient and delivery is too late. LRN21, a bridge replacement for the level crossing at Ash is welcome.

In addition to the AUE and PRB, a Super Garrison in Aldershot is being planned. What will the effect of this be on Local Roads in the west of Guildford?

Hot spots on the A323 may be improved, but the congestion will just move on to the next hold-up, be it a car turning right or stopping bus. Large queues will form at peak time at junctions, in particular the roundabout at the junction of the A323 and the B3411 and the traffic lights at the junction of the A323 and the A324. The A323 is a direct road from the AUE into Guildford.

ANNEX B

The flawed nature of the Settlement Hierarchy and Settlement Profiles in respect of Wider Normandy

Wider Normandy is not a village with a centre, but is a collection of the following hamlets; Normandy, Flexford, Christmas Pie, Willey Green, Wyke and the eastern side of Pinewoods, a ribbon development along the A323, the western side being in Ash. Strictly speaking Flexford and Christmas Pie are one settlement, though residents of Christmas Pie think of themselves as separate.

After reading the Settlement Hierarchy and Settlement Profiles documents it is clear to me that Guilford Borough Council (GBC) suffers from confusion between Wider Normandy and Normandy. Wyke is mentioned once and Willey Green and Pinewoods not at all, even to be rejected as being too loose-knit or too small. The populations and amenities of Willey Green, Wyke and Pinewoods are therefore not included in either document. In 2011 Wider Normandy had a population of 2,981. The populations mentioned in these documents are Normandy 585 and Flexford 1,199, a total of 1,784, leaving 1,197 people unaccounted for, over a third of the population of Wider Normandy.

The Settlement Hierarchy

The Settlement Hierarchy document starts with the bold statement "The settlement hierarchy study is a key part of our evidence base for the new Local Plan. ... This document will enable us to have a better understanding of the roles of each of our settlements". I don't think that the document shows any understanding of Wider Normandy or its settlements.

It is claimed that evidence gathering has identified that Flexford and Normandy would benefit from future development and access to key services for local residents. Where is this evidence?
I am not aware of demand for more services in Normandy, though there are some residents of Normandy who would like a shop for when they run out of milk or bread and to have a chat with the shopkeeper, particularly the chat. (When the Post Office closed, older residents would come to the Surgery and chat to the receptionist. The Church then started Tuesday teas for this group.) This, however, is not a viable business model. The Parish Council undertook a survey to assess demand for a shop, and found that demand was so weak that it would not be worthwhile. We had food shops and pubs in Wider Normandy, but they closed for lack of business. We still have bars in the British Legion and the Cricket Club. We have a farm shop which sells mainly meat, but also milk, fruit and vegetables, and a small range of organic groceries. It opens Weds - Sat and is well used.

The population of Wider Normandy is sufficient to support a pub, there used to be six 15 years ago when the population was less than it is today, and a convenience store, but pubs and local shops are in decline all over the country as living patterns change.

Since Fast Broadband arrived two years ago residents increasingly shop online. Sainsbury and Tesco delivery vans buzz round the hamlets, and I have seen the Post van stacked high with Amazon parcels at Christmas. I shop online; my friends in Normandy all shop online. My husband and I, and probably other residents, bank online. Online shopping and banking is the most sustainable for villages. Local shops will be less sustainable.

The Normandy Community Bus makes three trips a week to the supermarkets for residents who need transport. There is a convenience store in western Pinewoods, and a pub. The milkman delivers a range of groceries.

I am at a loss as to how the current residents of Normandy and Flexford will benefit from this plan, or in what way Normandy and Flexford will be more sustainable. The only thing on offer seem to be shops, which we do not need. The plan only brings disbenefits; loss of green open space, increased traffic, years of noise and disruption during building, pressure on existing services and a loss of identity, as the proposed development will double the size of Wider Normandy. The Settlement Profiles states "In terms of how well the villages work as a community, the settlement scores 35 out of 40, the highest scoring out of all the villages". This is what makes Normandy sustainable. Will this community spirit still exist if this plan is implemented? As for the evidence gathering, please see below.

The Settlement Profiles

These are the errors and omissions.

- P47 Wider Normandy is confused with Normandy Settlement. The document says "Normandy Parish Council considers Flexford and Normandy to be one village. We have therefore assessed and scored it on this basis." Normandy Parish Council considers Flexford and Normandy to be two settlements in the parish. Scoring Normandy and Flexford together is therefore incorrect. The nature of Normandy was explained in the last consultation, but the error has persisted. Why?

- Only Normandy and Flexford are considered. Wyke, Pinewoods and Willey Green are ignored. Wyke has two schools, Wyke Infant and Primary, two SNCIs (Wyke School SNCI and Normandy and Wanborough Woods SNCI) and a good bus service. Willey Green has a good bus service, 2 SNCIs (Withybed Copse and Henley Pak Fields SNCI and Broadstreet and Backside Commons SNCI) and 6 rural businesses, eastern Pinewoods has an Indian restaurant, a Chinese takeaway and a good bus service.

- On page 47 it states that Normandy has two schools. The schools are in Wyke.

- On page 47 it states in respect of Flexford "There is no central meeting place such as a village green within the village" which is true if Flexford is considered to be separate from Normandy, but untrue of they are considered as one, as in this document. Manor Fruit Farm, Normandy, where the Village Hall is situated, is a de facto village green. This is where the May and August Fetes, the 5th November Bonfire and Dog Shows are held. Manor Fruit Farm has a play area for children and an outdoor gym. The Doctors Surgery is also located here, and Normandy Therapy Garden.

- On page 47 it states that Manor Fruit Farm has direct access to London. There is a change at Guildford.

- On page 49 it states that there is a Site of Nature Conservation Importance (should be Interest) to the North of Normandy. There are 5 SNCIs to the North of Normandy; Normandy Common SNCI, Wyke School Woods SNCI, Normandy and Wanborough Woods SNCI and Withybed Copse and Henley Park Fields SNCI and Wyke...
Churchyard SNCI. It omits to say that there are 2 SNCIs to the South, Little Flexford SNCI and Broad Street and Backside Commons SNCI.

- On page 50, it is stated that Normandy has two Grade II listed buildings. Normandy has nine, Longer End Farm, Longerend Cottage, Hunts Hill House, Manor House, Normandy Hill Cottage, Normandy Hill Farmhouse, Glaziers, Halsey Cottage, not two (Or does GBC think that Normandy stops at the A323?). In all, Wider Normandy has 22 Grade II listed buildings.

- Flexford has a Scheduled Ancient Monument, a Romano-Celtic temple complex 385m west of Long Common. List no: 1019641 which lies between Flexford and Wanborough. This not mentioned,

- On page 50 Normandy and Flexford are again considered separately, instead of together, as stated.

ANNEX C

This development is not driven by objectively assessed need, as required by the NPPF, but by commercial considerations and GBC’s willingness to build on the Green Belt, rather than more difficult options within Guildford itself. The NPPF places priority on Evidence Based planning. This plan has been put forward by Taylor Wimpey, who have options to buy this land and therefore wish to develop it for commercial reasons, as developers quite rightly do. However, to get over the inconvenience of it being Green Belt land, they have offered a free school in return for permission to build 1,100 houses.

Once the offer of a free school in Normandy/Flexford was made, and only then, GBC started to talk about a lack of school places in the West of the Borough, based on need from Blackwell Farm, Ash and the Normandy/Flexford development. Normandy currently has about 20 children.

An amendment was passed at the GBC full Council meeting on 24th May which stated that if the need for a school was not proven, then there should be no development in Normandy/Flexford. It therefore follows that significant need for secondary school places from outside of Normandy should be shown, as children from the new development in Normandy/Flexford cannot be used to justify the school. At the GBC meeting on the 24th May I heard one councillor say “but if the school fails where will we build all those houses?” The houses are the driver and the school is the enabler for building on the Green Belt.

The Infrastructure required is not there

Transport

Roads

The A323, the road that passes through Normandy, is nearing capacity. Travelling eastwards, to turn into Bales Lane where I live requires a right turn on a sharp left hand bend. Sometimes it can be a long wait, and traffic builds up while I wait to turn. Other junctions in Normandy are similar. The traffic lights at the junction of the A324 and A323 have been identified as a bottleneck in the Surrey County Council Strategic Highways Assessment Report (SHAR) 4.9.1, as has the roundabout at the junction of the A323/B341.

Queues also build up on the A323 in Normandy on Mondays, when the rubbish truck collects. There are few bus bays, so traffic queues behind buses. There are no cycle lanes, which means that traffic has to slow and wait to pass cyclists on this narrow road, which has many bends as it passes through Worplesdon.

Westwood Lane and Glaziers Lane form the borders of the Normandy/Flexford Site. Westwood Lane, C16, is a narrow country lane on which two entrances into the Normandy/Flexford site are planned. Queues will form while cars and fairground equipment wait to turn right into the development. Glaziers Lane, D60, where a single entrance is planned is also narrow. These rural lanes have developed over time to allow people to travel to Guildford from Wider Normandy and between the hamlets. They were never meant for, nor are they suitable for, any weight of traffic.

Queues will build at the junction of Westwood Lane, the A323 and School Lane, where Wyke Primary School is located close to the junction. The SHAR table 4.3 anticipates that traffic on Westwood Lane will increase by 1284%. Anticipated improvements to Westwood Lane are not due until 2021-2026.
The A31 runs to the south of Normandy and can be accessed via Westwood Lane and Wanborough Hill. The A31 is a traffic black spot at peak times. Improvements to the junction at Puttenham Hill, if confirmed, will take place between 2021 and 2026.

It can be seen that traffic from developments is already preceding improvements to roads. Moreover, the improvements to the A323 and the A31 are anticipated, not confirmed. Given the nature of the A323, it is difficult to see how it can be turned into a major link between Aldershot, Ash and Guildford.

**Rail**

The Normandy/Flexford site is considered sustainable because it is next to Wanborough station. Children from Ash attending the school and commuters to Guildford are expected to use the train. Wanborough is a small rural station, unmanned, with a platform suitable for trains with 4 carriages or less. There are trains to Guildford and Aldershot half hourly, and one peak hour service to Reading, which stops at Farnborough. Commuters wishing to travel to London have to change at Guildford onto a service which is already crowded at peak times.

To find out availability on peak hour services I went to Wanborough Station on Monday 6th June between 7:30am and 8:30am. The train to Reading and trains to Aldershot were quite empty. The 07:48 to Guildford was quite full, but some seats were available. With 40 people standing per carriage, that train could probably have taken 200 passengers. The 08:18 was slightly less crowded. With full standing, this train could probably have taken another 300 passengers. That is 500 spaces on peak hour services for a development with a population of over 2,500 people. Even these few spaces are likely to be unavailable, owing the AUE. The train, a 17 minute journey from Aldershot to Guildford, is likely to be a popular option for AUE residents working in Guildford as it is a 20 minute walk or 10 minute cycle to the station, an overall journey time of 37 minutes.

GBC is in talks with the Train Operating Companies and Network Rail, but any improvements to the service are aspirational.

**Cycling**

Policy A46 mentions an off-site cycle network to Wanborough station. It is not clear to me where this proposed cycle network would be. There is no space in Glaziers or Westwood Lane, closest to the site, or on the A323. Policy A46 also mentions an off-site cycle network to the Christmas Pie Trail (a rural track), which would lead to key destinations, unspecified.

**Heritage Assets**

It is a core principle of the NPPF to conserve heritage assets so that they can be enjoyed for their contribution to the quality of life of this and future generations.

There are seven Grade II listed buildings and one Grade II listed tomb adjoining or close to, this site. The houses are: Westwood Place, Buckhurst, Great Westwood, Halsey's Cottage and Glaziers. The other buildings are: Great Westwood Barn and St Mary's Church. The tomb is the Pirbright Tomb.

**Westwood Place**

*IMAGE 1*

*Westwood Place has a wonderful approach from the footpath across the field. Building on this site will obscure this view.*

**Glaziers**

Glaziers, a lovely timber framed 16th century cottage, the Glaziers of Glaziers Lane, borders the site. GBC's own plan, according to the Sustainability Scoping Study, is that a site is red for development if an historic house is within 25m. Glaziers is within 25m of the site.

*IMAGE 2*
The Thames Basin Heaths Special Protection Area (SPA)

Policy P5 of the GBC Plan states that 8ha should be set aside for every 1,000 residents. GBC also estimates an average of 2.4 people per dwelling. As this site proposes to build 1,100 homes, 2,640 people, the SANG should be at least 21ha.

Degradation of Ancient Woodland and Ancient Trees and loss of Biodiversity

Part of this site was originally parkland, laid out with oaks, many of which remain, belonging to Westwood Place. Some oaks are on the Ancient Trees Inventory and are more than 5m in circumference. Other ancient oaks on the site have yet to be surveyed.

Flooding

Wider Normandy is prone to flooding in all but the driest months, as it is situated in a valley with Ash Ranges to the North and the Hog's Back to the South. As the soil is mostly clay, the drainage is poor. A number of small streams swell and burst their banks in wet weather. There are springs on both the slopes of Ash Ranges and the Hog's Back. The water from these springs, together with surface water, collect in Wider Normandy to form the infant Hoe Stream. The Hoe then passes through Woking to join the River Wey.

The Hoe is notorious for flooding. Woking Borough Council (WBC) and the Environment Agency have worked together to alleviate flooding from the Hoe. As part of the mitigation project, SCC have designed the Hoe Valley Path which follows the Hoe Stream. It is managed by WBC and is designated as an SNCI because of its varied habitats.

Any flood mitigation should therefore be of the greatest sensitivity, in order to protect the Hoe and to avoid flooding other areas of Wider Normandy.

Degradation of the view from the Hog's Back AONB

Currently the small development of Christmas Pie can be seen from the Hog's Back. The houses are low rise and there is minimal street lighting. A46 will be highly visible.

IMAGE 3

NEW SITE

CHRISTMAS PIE

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

Attached documents:  
IMAGE 1.jpg (244 KB)
IMAGE 2.jpg (333 KB)
IMAGE 3.jpg (331 KB)

Comment ID: PSLPA16/702  Respondent: 8893857 / Derek Bullman  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to object strongly to much of the contents of this consultation document. My objections are both general and specific in relation to West Horsley, which is where I have lived for the past ten years.

General objections:

1. Guildford Borough Council (GBC) has not revealed the basis upon which the alleged additional housing need has been calculated. Post the referendum, with restrictions on further immigration, the assumptions - whatever they may be - may well need to be revisited.

2. There need to be exceptional circumstances to permit appropriate building in the Metropolitan Green Belt.

3. I strongly support fully maintaining the Green Belt and village boundaries "as is"

4. These proposals are extremely inappropriate

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

Attached documents:

| Comment ID: PSLPA16/2006 | Respondent: 8894977 / Janet Burgess | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I OBJECT to the DLP as it currently stands. It has been constructed on the basis of housing numbers which no-one, councilors or members of the general public, has had the opportunity to scrutinize. GBC has consistently refused to make available the formula by which the numbers have been calculated, apparently because the company to whom the task of determining the numbers was delegated has claimed intellectual property rights as a reason for non-disclosure. Without public scrutiny of the projected housing numbers the DLP can have no validity.

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

Attached documents:

| Comment ID: PSLPA16/1026 | Respondent: 8895233 / Clare Axten | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

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

Attached documents:

| Comment ID: PSLPA16/2925 | Respondent: 8896097 / Andrew Fordham | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
23. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.
It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/1148  Respondent: 8897377 / Jan Jewers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

MY OBJECTIONS TO THE 2016 LOCAL PLAN

1. I object to the lack of evidence and openness for the alleged housing need numbers, and believe the SHMA figure is too high when compared with other local boroughs

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

Attached documents:

Comment ID: PSLPA16/1683  Respondent: 8897473 / John Fluker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
The proposed housing numbers have no basis in the real world and seem to have just been plucked at random out of thin air. This completely undermines the basis of the whole Plan and makes it an entirely invalid exercise. Until this is rectified the whole Plan is worthless.

The final major flaw in the Local Plan is of course that it was created on the basis that we were in the EU and whilst I voted to stay we are now in a post Brexit world and everything is likely to change. The Local Plan must clearly now be revised to reflect the fundamental changes that will result from this exit from the EU.

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

Attached documents:

---

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
1. The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, over double the previous figure of 322 used in previous plans. It has been reported that the SHMA report methodology is susceptible to challenge as it inflates the needs of the borough by distorted student numbers. However, as it is based on commercially confidential modelling assumptions, that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/1875  Respondent: 8899713 / Tessa Crago  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: pslp173/623  Respondent: 8900161 / Peter Gelardi  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
2. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

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

Attached documents:

Comment ID: PSLPA16/2004  Respondent: 8900481 / John Burgess  Agent:

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

I OBJECT to the OLP as it currently stands. It has been constructed on the basis of housing numbers which no-one, councillors or members of the general public, has had the opportunity to scrutinize. GBC has consistently refused to make available the formula by which the numbers have been calculated, apparently because the company to whom the task of determining the numbers was delegated has claimed intellectual property rights as a reason for non-disclosure. Without public scrutiny of the projected housing numbers the DLP can have no validity.

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

Attached documents:

Comment ID: PSLPA16/3926  Respondent: 8900641 / Caroline Carr  Agent:

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

• I object to the last minute inclusion of new sites with less than 2 weeks notice

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

Attached documents:

Comment ID: PSLPA16/1126  Respondent: 8900705 / Susan Fuller  Agent:

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

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:
b) How has the demand for this extra housing been established? It seems that the ready availability of Green Belt land offered for sale is the driver for allocation of such sites for development.

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

23. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Respondent: 8901825 / Raymond Woolfson</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>My response to the Guildford Borough Local Plan</td>
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<td>I attach my response for the Inspector which contains the following objections:-</td>
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<td>1. I object to the conclusions of the Strategic Highway Assessment Report which are over optimistic.</td>
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<td>2. I object to the Transport Strategy, as not enough attention is paid to improving minor roads.</td>
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<td>5. I object to the housing target in the SHMA which is too high.</td>
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<td>6. I object to flaws in the Settlement Hierarchy in relation to Normandy and Flexford.</td>
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<td>I object to the housing number of 693 homes each year from the West Surrey Strategic Market Housing Assessment 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. Councillor Reeve's recent paper demonstrates that the methodology is fatally flawed and 510 is a better estimate.</td>
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the lack of a clear case to prove local demand for additional housing of the scale proposed in the Plan

Additionally, there is no proven case for the supposed demand for such a large number of houses in this area. West Horsley Parish Council’s own analysis suggests that approximately 20 properties would be needed in order to meet demand from local people otherwise unable to stay living in the village - a development of that scale and for that explicit purpose would be entirely understood, but what is proposed is anything but. It is unreasonable to expect a few villages in the Borough (of which West Horsley is the most extreme case) to take a share of the burden of future development that is wholly disproportionate to the scale of those villages today, when the equivalent number of houses added to already well-established urban centres (e.g. Guildford) would result in far less significant change to the character of the area.

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

Attached documents:

Comment ID: PSLPA16/4519  Respondent: 8903265 / Susan Anderson  Agent:

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confident modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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:
2. The assessment and calculation process for 693 new homes has been far from transparent and is more than double the figure used in previous plans. These unaudited figures drive all the calculations. I attended the Planning Meeting authorising the publication of this plan when councillors unconvincingly rejected a request from others to forensically review the calculations. Councillor Reeve’s Report "A Review of the Guildford Objectively Assessed Housing Need July 2016" must be review by professionals before proceeding further.

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

Attached documents:

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Comment ID: PSLPA16/1123  
Respondent: 8904673 / Colin Burnside  
Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. APPENDIX D

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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

Attached documents:

Comment ID: PSLPA16/3801  Respondent: 8906945 / Ken & Pat Homewood  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

There also now appears to be some doubt over Strategic Housing Market Assessment accuracy, on which all of the Local Plan is based, as the mathematical model used to generate the calculation is not revealed in the plan and from what we can ascertain has not been seen by GBC. It would be interesting to see what effect BREXIT would have on the calculation.

In summary we believe that the calculation of the SHMA should be revisited and that most of the Green Belt sites identified should not be used, a more radical view of Brownfield sites should be undertaken and builders should be forced to give more consideration to affordable housing and the TOTAL infrastructure issues should be addressed before the plan is accepted.

I hope our comments are accepted as constructive and look forward to the next phase of the plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2059  Respondent: 8907137 / Jennifer A. Milligan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 new houses that are deemed necessary based on the Strategic Housing Market Assessment (appendix D) and object to the disproportionate allocation in this part of the Borough (north-east). There is no evidence of this need.

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

Attached documents:

Comment ID: PSLPA16/2061  Respondent: 8907137 / Jennifer A. Milligan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Another point is that we are now post-Brexit and who knows what will happen. Perhaps there won’t be the need for all these new houses. I cannot understand why Surrey must be so overcrowded when there are parts of the country that are depressed and need redevelopment. Move people away from Surrey rather than attracting them all here.

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

Attached documents:

Comment ID: PSLPA16/1918  Respondent: 8907265 / Jan Brind  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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.

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

Attached documents:

Comment ID: PSLPA16/2170  Respondent: 8907393 / Helen Cannon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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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>I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability. The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<td>With regards to the substantial number of houses supposedly required in the area, should it not be the responsibility of the elected council to determine the amount required anyway; not outsider companies as is apparently the case? What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</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>
<td>1. GBC is proposing huge irreversible damage to our local environment on the basis of figures used in the Strategic Housing Assessment that have been questioned, both with regards quality and impartiality. Until the council are in a position to explain and justify the figures used any plan is likely to be fundamentally flawed. (Furthermore, in the light of Brexit and the PM’s warnings of economic disaster, it must be necessary to revise down the figures.) What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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The proposed housing requirement of 693 suggested from GL Hearn is far too high. It has not been possible to interrogate the calculations because the necessary supporting information has not been provided by GBC. Guildford cannot, and should not, be in a position where this type of increased is forced upon the borough.

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

Attached documents:

We have serious misgivings about the reliability and viability of much of the evidence.

- The Strategic Highway and Assessment Report (SHAR) has been produced late and is unfinished. Vital information about traffic congestion – how much will occur and where – has not been given in time to inform Plan proposals or responses. It would appear that the proposal to build 1000+ homes on Slyfield will not generate any additional traffic; omissions like this undermine the Plan and render it unsound.

- Too much emphasis is placed on replacing cars with bus and cycle use. An increasingly elderly population is far more likely to use cars than rely on an uncertain bus service; the disabled and infirm, parents with young children, people wanting to shop for bulky items are all more likely to use cars. This needs to be acknowledged.

- The proposed Sustainable Movement Corridor (SMC) cannot be delivered as the roads are too narrow and have pinch points. This certainly applies to Burpham. The A3100 London Road will become an SMC supposedly carrying north and south bound bus and cycle lanes in addition to general traffic lanes north and south bound; four lanes of traffic where only two exist at present. This suggests that someone engaged in a paper exercise without making a site visit armed with a tape measure, an unsound practice that will have a deleterious effect on our community.

- There are major traffic issues that are not resolved. Guildford suffers from the constraints of a gap town yet there is little information about how traffic will be organised to cope with this – will there be new town bridges, a central bus interchange, and is a tunnel to carry through traffic considered a viable proposition?

- The cumulative effect of the developments proposed in the Plan look set to increase congestion, so the comment that they would have “an acceptable impact on the capacity of the highway networks in terms of the policy text set in paragraph 32 of the NPPF” is questionable. There is no objective for reducing congestion in the Local Plan just a statement about opportunities to “improve the performance of the road networks through transport infrastructure service improvements.” This is aspiration, not a detailed exposition of how a sensible outcome is to be achieved.

- It is unsound to publish a Draft Local Plan without a clear view of the essential issues of road infrastructure and transport. There are indications that road improvements will be undertaken but they are vague and dependent on as yet unpublished proposals by Surrey County Council and Highways England.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/345  Respondent:  8909185 / Jamie Hogg  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 evidence for the suggested housing need numbers.

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

Attached documents:

Comment ID: PSLPA16/3531  Respondent:  8909313 / Andrew Fairley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Population growth

I have major concerns in relation to the assumed population growth and by extension the number of new homes this suggests are required. I have been unable to ascertain from the information provided on GBC’s website how the forecast number of homes required was derived but overall a SHMA target housing number for the borough which is two thirds higher than the official national estimates appears inflated. Given these population projections are a key foundation for the Local Plan, I believe the plan is based on an unsound assumption and essentially flawed as the housing needs and number of required new homes are over stated.

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

Attached documents:

Comment ID: PSLPA16/4498  Respondent:  8909761 / Diana Grover  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council
received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

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

Attached documents:
Comment ID: PSLPA16/2231  Respondent: 8910817 / Anne Elkington  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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. The calculation process has not been demonstrated accurately and appears flawed.

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

Attached documents:

Comment ID: PSLPA16/2232  Respondent: 8910817 / Anne Elkington  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D). The proposed growth in the Plan is based on the SHMA report. The 693 homes a year as stated as being required by the borough, is over double the previous figure of 322 used in previous plans. I feel that the SHMA report methodology is not accurate. It appears to be based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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

Attached documents:

Comment ID: PSLPA16/4386  Respondent: 8913889 / Penny White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 for the following reasons.

You are apparently not aware of how the numbers for new homes have been calculated. How can you deem them correct if you are not able to scrutinise them.

Please ensure you honour your mandate and re-issue your local plan with the greenbelt in its entirety remaining as greenbelt and planning, with full infrastructure needs, on brownfield sites only. It is also your responsibility to ensure the numbers are correct and without the information as to how they have been calculated you cannot do so.

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

Attached documents:

Comment ID: PSLPA16/799  Respondent: 8913985 / Lynda Newland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 evidence for housing needs in this area. I question how these numbers are generated especially now we have voted to leave the European Union. There appears to be a disproportionate number of houses proposed in one area of 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: PSLPA16/1279  Respondent: 8914049 / Diana Bridges  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The Local Plan is lacking evidence and detail

I feel there is a big disconnect between the requirements most residents feel they need and the locations they would sight developments against the methods employed by GBC and the seemingly alarming developments proposed.

The plan is considerably lacking in details which does nothing to help the residents who ultimately will determine the plan as a collective. For example

1. There is no explanation of why so much housing capacity is required in this area and who it is for.
2. There are no artist’s impressions of how a development might look or any idea given of what an “affordable house” looks like
3. What is a traveller’s pitch?
4. Are there any conditions attached to the allocation of travellers pitches?
5. How are they to be managed? How are services arranged and paid for?
6. What term do the travellers stay for? Is there a minimum or maximum?

I feel if these questions could be answered then I would be better informed and could make a better decision.

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

Attached documents:

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Comment ID: PSLPA16/3833  Respondent: 8914177 / J.V. & H.P. Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

• It is my understanding that the 2014 draft local plan was created using estimates of population growth that were inaccurate as evidenced by later Office for National Statistics data. This generated plans for excessive housing provision of high density that would have had serious impact on the unique rural characteristics of the villages of East and West Horsley should the plan have been approved. The current 2016 proposal has increased the number of proposed buildings based on undisclosed data which raises concern over the validity of the plans. As they stand such high numbers will have a devastating impact on the villages. Any plans should be revisited in the light of affirmed new data and revised accordingly.
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<th>Comment ID: PSLPA16/3326</th>
<th>Respondent: 8915297 / Brenda Chamberlain</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<th>Comment ID: PSLPA16/3948</th>
<th>Respondent: 8915905 / Rhiannon Stroud</th>
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<td>I am very disappointed to be writing again to object to Guildford Borough Council’s Draft Local Plan. This Plan is not very different to the one I objected to in 2014 and the Borough Council haven’t listened to the many objections on housing numbers and development on the Green Belt. Section 150 of the Housing and Planning Act 2016 states that a site, once identified in a Local Plan, is assumed to have permission to go ahead in principle. Now, more than ever, it is imperative that this Local Plan works as a whole, providing not only the right amount of housing but also sustainable housing that has the infrastructure in place to support the development. At the full Guildford Borough Council meeting on May 24 this year, one of my local Councillors, Matt Sarti (Con, Clandon &amp; Horsley), said &quot;I don't personally agree that this Local Plan is ready for consultation. The SHMA is obscure..... and is open to challenge. I don't think that we have imposed the constraints we should do. Seven per cent of green belt will be removed by changing settlement boundaries and by building on strategic sites. Can we really justify that?&quot; I agree with Matt Sarti. There are major problems with this Draft Local Plan.</td>
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<th>Comment ID: PSLPA16/1131</th>
<th>Respondent: 8916001 / Ockham Parish Council (Peter Bevan)</th>
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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.

**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: PSLPA16/1781</th>
<th>Respondent: 8916001 / Ockham Parish Council (Peter Bevan)</th>
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5. 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.

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

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<th>Comment ID: PSLPA16/1174</th>
<th>Respondent: 8916353 / John Franklin</th>
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3. So where is the GBC group collecting details in Brown Field sites within the Borough? Where is the report from the GBC Brown Field Tsar? Where is the coordination with the National Brown Field site Tsar? Where is the un-used air-space strategy? As well as the Brown Field site philosophy we need a part used site philosophy whereby we build over single stored level usage areas, the super market car parks, the station car parks, the railway lines, as well as stations etc, as has already happened on the Chiltern Line. These sites readily lend themselves to rafts of 3 storey blocks of 2 bedroom flats which are the most pressing housing needs, so we are told.

**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: PSLPA16/505</th>
<th>Respondent: 8917665 / Frances Porter</th>
<th><strong>Agent:</strong></th>
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I write to lodge my objections to the Proposed Local Plan and the inclusion of the Former Wisley Airfield also known as Three Farms Meadows

**I object** to the SHMA as feel this is too high and councillors and those people that have asked have still not seen all the calculations.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1522  **Respondent:** 8918913 / Sarah Khadka-Lowe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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

Attached documents:

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**Comment ID:** PSLPA16/3203  **Respondent:** 8919009 / Andrew Kukielka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. **SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted. P2

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider
constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

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1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3169  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I trust that these objections will be fully considered and that the Former Wisley Airfield/ Three Farms Meadow, Allocation A35, will now be removed from the draft Local Plan with immediate effect.

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

Attached documents:

Comment ID: PSLPA16/3315  Respondent: 8919393 / Steve and Angela Gill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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): it is an unrealistic assessment and far too high. The assessment and calculation process has not been rigorous and has been far from transparent. The newly estimated numbers are more than double the figure used in previous plans and have no real justification. Further to this, when directly compared with assessments made by neighboring councils whose future housing requirements must be very similar, the GBC figures are more than 50% greater. The Local Plan must not be approved until a more accurate and realistic assessment of housing needs is undertaken.

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

Attached documents:

Comment ID: PSLPA16/1928  Respondent: 8920353 / Andrew Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Housing Need:

The fundamental reason for the Green Belt even being considered as potential for Housing by GBC has largely come about as a result of perceived Housing need, in this regard the DRAFT local Plan is predicated on perceived Housing need; in this respect and following Brexit the SHMA surely needs to be re appraised. The current SHMA as drawn up by GL Hearn and Partners calculates that 693 homes need to be built in the Borough each year, this is an eye watering number and to that end the statistical modelling and the basis for the housing figures needs to be rigorously analyzed, has it been done and if so by whom? If not when will it be undertaken and when will the findings be published for all to see and assess?
It is imperative that both the SHMA and ELNA figures are reappraised following Brexit and I hope that GBC will be asking for a detailed assessment as to how the figures for Housing need have been assessed. It is absolutely vital that the SHMA figures and the basis of their calculation are scrutinized by parties other than officers of GBC! Housing need figures are fundamental to Local Government Planning Policy not only today but for many years to come and could form the blueprint for the next 20 years.

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

Attached documents:

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Comment ID: PSLPA16/2883  
Respondent: 8921377 / Paul Maycox  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

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Comment ID: PSLPA16/3696  
Respondent: 8921409 / Martin Butcher  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

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The whole plan is based on a SHMA conducted consultants whose working model assumptions are not revealed in the plan. And on top, GBC have seemingly and arbitrarily, increased their predicted housing need still further for good measure?

Recent events (Brexit and political changes) show just how quick the norm can change. This plan is based on predictions made BEFORE these events and are supposed to take us to 2032! We don't even know what's happening next week, let lone 15 years time! To me, Brexit and any questions around migration fundamental undermine any assumptions made in the consultants SHMA model and as such the whole plan should be scrapped or at least suspended until the post Brexit world is clearer.

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

Attached documents:

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Comment ID: PSLPA16/3137  
Respondent: 8921569 / Steven Cliff  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The proposed growth in the Plan is based on the SHMA report. A conclusion of 693 homes a year as the borough’s requirement is over double the figure of 322 used in previous plans. I consider that the SHMA report methodology is inaccurate; student numbers distort the result and it uses commercially confidential modelling assumptions that cannot be checked or reviewed.

This lack of transparency is undemocratic and inappropriate as a basis for consultation on a Local Plan.

Several factors are permitted by the National Planning Policy Framework to be taken into account to reduce the overall housing target - protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints. All of these factors apply to Guildford Borough, yet this local plan and the SHMA number have disregarded these factors.

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

Attached documents:

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Comment ID: PSLPA16/1545  
Respondent: 8921793 / Graham Richings  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I have a further objection to The Guildford Plan. Please will you add this document and the attachment to the submission that I made to you on 10th July and ensure that it is forwarded to the Planning Inspector when he/she examines the Guildford Local Plan.

Your Council is still obstructing the public from obtaining vital information in order to comment on this Plan. Calculations on how the housing needs have been arrived at. I am attaching an email response that I have had from your Managing Director yet again explaining why the information is not being supplied. The excuses are not good enough and the Planning Inspectorate need to be made aware of this at any forthcoming enquiry. To quote commercial sensitivity to something that you have paid for and need to able to verify is not a good enough reason for non-disclosure. Action needs to be taken against GL Heam to obtain this information.
Number of houses.

I find it very difficult, if not impossible, to comment on the housing numbers that are deemed necessary in this Local Plan. This is for the reason that Guildford Borough Council (GBC) will not provide me or any other member of the public with the formulae or any detail of how the housing need figures are arrived at. This despite the fact that the public must be consulted and are entitled to give their views on the Local Plan. One of the main purposes for the Local Plan is to plan for future housing needs. We need to be able to comment on those needs and we must know how they have been arrived at and if they are anywhere near accurate. We are told that we can purchase software that will allow us to do the calculations and that we can obtain data for which we will probably need to pay for from various institutions. This has been made clear to me by GBC Managing Director, Sue Sturgeon and also published in the local press. This applies to Guildford, Waverley and Woking Council areas. It is not right that members of the public should be treated in this manner and our Council should be assisting us in what is a legally backed consultation. So much as I would like to comment on the housing numbers, which I consider to be far too high, I am unable to do so. I am sure that the housing NEED is nowhere near as high as the proposed numbers. This is clearly a complicated matter because surprisingly the Planners at GBC were unable to do it themselves and employed a firm of consultants, GL Hearn. One hopes that GBC members and officers understand what the consultant has done and can explain it in detail to the Inspector. I believe that he should query this obstructive policy on the part of GBC and at this late stage direct this Council to provide members of the tax paying public with the information to which they are entitled without payment or the need to buy special software themselves.

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

Comment ID: PSLPA16/3202  Respondent: 8921857 / Claire Kukielka  Agent:

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

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council
received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:

Comment ID: PSLPA16/3208  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.
It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/3760  Respondent: 8922401 / Ken Harrap  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Council has provided no information on the quantitative housing need in the borough and the requirement for 13,860 new homes appears not to be supported by a housing needs survey. I cannot believe that this is the case and would be grateful for information on how this number was arrived at. I have not seen any published data.

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

Attached documents:

Comment ID: PSLPA16/3692  Respondent: 8922689 / C Poole  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 new homes to be built which I feel is unjustified and based on unproven and unrealistic growth levels.

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

Attached documents:

Comment ID: PSLPA16/4117  Respondent: 8923905 / Claire Bridges  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Local Plan is lacking evidence and detail

I feel there is a big disconnect between the requirements most residents feel they need and the locations they would sight developments against the methods employed by GBC and the seemingly alarming developments proposed.

The plan is considerably lacking in details which does nothing to help the residents who ultimately will determine the plan as a collective. For example

1. There is no explanation of why so much housing capacity is required in this area and who it is for.
2. There are no artist’s impressions of how a development might look or any idea given of what an “affordable house” looks like.
3. What is a traveller’s pitch?
4. Are there any conditions attached to the allocation of travellers pitches?
5. How are they to be managed? How are services arranged and paid for?
6. What term do the travellers stay for? Is there a minimum or maximum?

I feel if these questions could be answered then I would be better informed and could make a better decision.

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

Attached documents:

Comment ID: PSLPA16/780  Respondent: 8924065 / Rachel & Colin Holloway  Agent:

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

3) 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.

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

Attached documents:

Comment ID: pslp173/683  Respondent: 8924161 / Peter & Victoria Luckham-Jones  Agent:

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

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1440  Respondent: 8924577 / Charles Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high

   • The “objectively assessed need” figure of 693 homes a year is too high.
   • A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   • The current SHMA inflates the proposed housing figure due to
     ◦ failure to correct for errors in the historical data for international migration flows,
     ◦ issues with the way it considers students and affordability and
     ◦ flaws in the method for estimating the number of homes needed to support job growth.
   • It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/425  Respondent: 8925153 / D B Saidman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Strategic Housing Market Assessment - This analysis is spurious and has no validity at all.

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

Attached documents:

• I object to the methodology used to estimate housing numbers

The number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) generated by a consultant's mathematical model which is not revealed in the plan, nor apparently has it been revealed to Guildford Borough Council (GBC). The Office of National Statistics has acknowledged a mistake in the numbers used by the SHMA and have updated their predictions, yet these revised figures are not reflected in the GBC Local Plan. The original unsubstantiated SHMA target housing number has been further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households – greater than any other single area in the Borough.

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

Attached documents:

3) I OBJECT to the lack of any evidence for the alleged housing need numbers.

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

Attached documents:

3) I OBJECT to the lack of any evidence for the alleged housing need numbers.
I know there have been many lengthy, detailed letters of objection registered already - mine will not be one of those but its objection carries just as much weight!

I believe the Guildford Local Plan to be flawed from the very start, and even more so in light of Brexit. I understand that the target housing outlined in the plan represents an increase in 25% in the borough - already at odds with that of the ONS of 15%, and that no one, except the consultants commissioned to complete the report actually know how that figure was arrived at - and that includes those at GBC. It is time the right questions were asked and the true answer given to reflect the current expected demand, not based on a formula from several years ago.

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

Attached documents:

Housing Needs Numbers

I OBJECT to the housing needs numbers included in the local plan as far too high. An annual build of 693 new homes per annum represents a net increase of 25% in the housing stock of Guildford Borough when official statisticians at the Office of National Statistics are projecting a population increase of some 15% for Guildford Borough over this same period. In particular over 23% of this new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys, totally out of proportion to the population living there.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4114  Respondent: 8927905 / Jacqueline M Fish  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/2785  Respondent: 8928033 / P. Richardson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Flawed Data

The assumptions made regarding population growth are flawed and the resulting figures for housing needs are correspondingly wrong. The DLP calls for over 13,000 new houses over 15 years, an annual average of over 850, which I understand compares with a running ten year average in the region of 160 per year. This assumes the accommodation of an influx of people into the borough rather than the accommodation of the borough’s own organic growth.

I note that one of the tables attached to the DLP shows 14,660 new houses so the DLP is not internally consistent. Further, the north-east quadrant of the borough is proposed to get some 6,000 or nearly 50% of these new dwellings which is unreasonable. Since these additional houses are presumably planned for commuters, it should be noted that the roads and rail services between this area and London are already full to capacity during the morning and evening rush hours and cannot be expected to carry the resulting additional traffic should these houses be built.

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

Attached documents:

Comment ID: PSLPA16/2794  Respondent: 8928033 / P. Richardson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
OBJECT to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D)

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? A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

? The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

? It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable. The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

Comment ID: PSLPA16/1422  Respondent: 8928161 / Jan Brophy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent. I understand that plan includes a figure which is almost 70% higher than the official national estimates for population growth in the Borough. The scale of this increase has alarming results for example an increase of up to 35% in existing West Horsley households - greater than any other single area in the Borough.

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

Attached documents:

Comment ID: PSLPA16/2859  Respondent: 8928289 / Trevor Skerritt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/4108  Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Proposed housing numbers in the Borough.

I do not agree with the predicted housing need of 693 houses per year.

Since the 2014 draft Local Plan, the housing need has apparently increased, despite huge numbers of objections received for the 2014 draft Local Plan. Recently 2 people independent of each other (a consultant employed by The Guildford Residents Association and Cllr David Reeve, one of your Borough Councillors) have done a considerable amount of work to calculate what the housing need should be, using ONS and economic data. Each of them has come up with a very similar figure – a number considerably less that the 693 proposed by your contractors GL Hearn.
Why hasn’t Guildford Borough Council done their own checking of the numbers produced by the Hearn report? Surely the Residents of the Borough should be able to expect the highest integrity from their Council and that any major changes proposed have the fullest checking undertaken before documents are put out for public consultation.

Since both these people have done their work, we have had a huge change thrust upon the UK by the vote for Britain to leave the EU which is likely to reduce our housing need still further. This result has thus rendered the latest SHMA (and therefore the current draft Local Plan) **obsolete and in need of urgent revision.**

Guildford Borough has constraints imposed on it of having 89% of its land designated as Green Belt and around 50% as AONB. Our current plan is to inset around 7% of the Green Belt land so as to build on it. Surely we should instead be saying we must protect it from development and use it as a valid constraint to reduce our SHMA figure?

Why hasn’t Guildford Borough Council used the allowable mitigating factors to reduce the apparent number of dwellings required of us by the government? We are a county which is largely AONB or Green Belt land – we simply cannot fit large number of houses. NPPF says we are able to take AONB/Green Belt into consideration.

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

**Attached documents:**

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**Comment ID:** PSLPA16/23  **Respondent:** 8929057 / East Horsley Parish Council (Nick Clemens)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

**Comments on Proposed Submission Local Plan**

East Horsley Parish Council (“EHPC”) has carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation. Our comments are set out in this letter.

EHPC has strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, EHPC does not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

EHPC also notes that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. We fully and un-equivocally support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

EHPC is also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan. **EHPC therefore OBJECTS to the Proposed Submission Local Plan.**

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by our comments on specific site allocation policies.

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

**Attached documents:**

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**Comment ID:** PSLPA16/200  **Respondent:** 8929921 / Caspar Hancock  **Agent:**
### Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

3) I OBJECT to the lack of any evidence for the alleged housing need numbers. The SHMA has not been qualified in any meaningful way and does not bear any analysis. The only "evidence" that seems to have been provided is that there is a DEMAND for housing rather than a NEED. This is simply not good enough.

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

Attached documents:

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**Comment ID:** PSLPA16/1156  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:

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**Comment ID:** PSLPA16/1158  **Respondent:** 8930209 / Ray Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

1. **APPENDIX D**
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:
Unmet housing need is not an exceptional circumstance in law. The housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) is far too high. This assessment and calculation process is widely questioned, has been far from transparent and is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to the former Wisley Airfield, an area that at present has only 0.3% of the population of GBC).

the plan proposes over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without needing to encroach on protected Green Belt land.

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our need for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing. Surrey University is apparently sitting on permission for 1500+ accommodation units on its own brownfield campus. If the University fulfilled its obligations much town centre affordable accommodation would be available for rental/purchase

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

Attached documents:

Comment ID: PSLPA16/3037  Respondent: 8931233 / John Pemberton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I object to the 2016 draft Local Plan for the following reasons –

I object to GBC’s refusal to justify the housing needs number of 13860. This is more than twice the needs in the previous Plan and no one wants to explain the logic!!

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

Attached documents:

Comment ID: PSLPA16/4094  Respondent: 8931649 / Ray Briggs  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

I have already made comments which object to the local plan in various ways. I am informed that these will only register as objections if I use the word ‘object’ in them. Please be advised that all my comments indicate that I strongly object to the building of a large number of homes in the borough, I strongly object to the lack of a defined plan for infrastructure as it means that the consequences of the local plan are not addressed, and I strongly object to the lack of transparency in the evidence base for the local plan.

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

Attached documents:
Comment ID: PSLPA16/4434  Respondent: 8932193 / Maureen M. Chalmers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 as it is excessive and cannot find from your documentation how this figure is calculated for the SHMA. I understand that GBC also do not know how the number was arrived at and are fully dependant on a third party consultant's software that only they understand. I would be surprised if this passed scrutiny at the inspection by the Planning Inspectorate in December.

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

Attached documents:

Comment ID: PSLPA16/3762  Respondent: 8934561 / Chris Jubb  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The Guildford Residents Association has commissioned an expert report on the SHMA which concludes that the objectively assessed housing need is smaller than the prediction by G L Hearn. It appears that there was pressure to come up with a large figure. Particularly unsupported is the addition of 31 houses per year to increase affordability. Why is it 31 and not 300? What economic model justifies that such an element in the target will do anything for affordability? All adding this number will do is bring extra people to settle in Guildford who can afford the high prices, it will not bring prices down.

Why has Guildford not applied constraints to the housing target in the way allowed by the planning guidance and used by neighbouring boroughs? Stating that this will be applied on a case-by-case basis is not the same as having a plan. It means there will be endless negotiations with developers which are bound to be defeated on grounds of viability. The purpose of having this feature in the planning process is to allow for the recognition of constraints such as flood plain, AONB, green belt, etc. The plan authors have abdicated their responsibility to the Borough’s inhabitants to maintain the attractions of the town and its surrounding countryside. The omission of constraints on housing need is unacceptable.

The evidence is not yet in a sufficient state to support the increase in housing and retail proposed in the plan. Where is the central bus exchange to be allowing passengers to change from one service to another? How will the increased number of rail passengers access the station? How much traffic relief will the sustainable transport corridor provide and will it be feasible in the current narrow roads? How will shoppers travel to the extra 40% of retail space?

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

Attached documents:

Comment ID: PSLPA16/573  Respondent: 8934657 / Nigel Watson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Since I began to put these comments together, there has been an enormous change in the outlook for the UK, which will have impacts on Guildford and everywhere else - and render the Plan’s housing targets void as the assumptions behind
them are no longer valid. The referendum vote that the UK should leave the EU (which I personally did not want, but is now a fact of life) will reduce pressures on our housing stock in two ways. There will be less immigration, and it is also likely there will be a general deterioration in the UK economy. Both these things now make futile the high-growth wishful thinking that lies behind the Plan’s projected housing numbers. The whole Plan needs to be reconsidered to take account of these changed national circumstances.

Finally, it is also objectionable that the Council has published its proposals with such a short time allowed for public comment, on such a long and complex document; especially at a time when much public attention has been taken up by the EU Referendum, and when many people are going on holiday. More time ought to have been allowed for comment. Due to various other commitments I have had insufficient time to study the whole of the Plan properly. So I reserve the right to submit additional comments if I have time to complete my perusal between now and 18 July.

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

Attached documents:

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Comment ID: PSLPA16/3476  Respondent: 8934945 / David Grimmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

The housing number of 693 is far too high. The SHMA calculations on how this number was reached have not been provided (and we have been asking for two years). Nobody in the council has checked it (or that is what the council have told us). Resident cannot check the calculation as GBC have refused to provide it. We are taking the number on trust from a company called GLHearn who represent developers, and boast on their website they solve developer problems.

Constraints on the housing number NEED to be applied as allowed but have not been. Guildford is 89% Greenbelt, 44% Area of Outstanding Natural Beauty, yet our roads are gridlocked and that is TODAY. This plan will not fix that just make it worse that is 14000 houses at 2 cars per house... on our roads extra!

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

Attached documents:

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Comment ID: PSLPA16/2037  Respondent: 8938081 / V J Foot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Further, I notice that the projected housing "need" is based on analytical studies and adjustments involving dubious arithmetic which has been queried by planning experts. At the very least, the calculations are not transparent and open to scrutiny. Taken across the whole borough, they involve a 25% increase in the housing stock which seems scarcely credible, all the more so when majority of houses are planned to be built on what is currently Green Belt land, and the government has 'categorically said that these are not "special circumstances".

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

Attached documents:
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
   • The "objectively assessed need" figure of 693 homes a year is too high.
   • A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   • The current SHMA inflates the proposed housing figure due to
     • failure to correct for errors in the historical data for international migration flows,
     • issues with the way it considers students and affordability and
     • flaws in the method for estimating the number of homes needed to support job growth.
   • It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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 that there has not been and demand that (a) there should be a significant challenge to the GBC scenario planning and (b) the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

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

1.0 INTRODUCTION

1.1 These representations have been prepared by Barton Willmore LLP on behalf of Martin Grant Homes (MGH) who own the land at Gosden Hill Farm, to the north-east of Guildford, hereafter referred to as ‘Gosden Hill’.

1.2 These representations are submitted in response to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites consultation document (June 2016) (‘the Local Plan’).

1.3 The representations are supported by the Vision and Development Framework Document (VDFD) for Gosden Hill, prepared in 2014, which remains largely up-to-date. Where necessary, updated or additional information regarding specific site-related issues is provided within these representations. The VDFD and the Revised Framework Masterplan are enclosed with these representations (see Appendix 1 and Appendix 2).

Overview

1.4 MGH is generally supportive of the Local Plan in terms of the vision and strategic policies. In particular, we support GBC in taking forward a Local Plan with the aim of meeting the objectively assessed housing needs of the area as identified in the West Surrey Strategic Housing Market Assessment (SHMA) September 2015. Inevitably, this requires a review of the existing Green Belt boundaries in order to meet these needs. In this regard, MGH fully supports the allocation of Gosden Hill and provides detailed comments regarding the policy criteria set out within Policy A25 and related provisions contained within the Infrastructure Schedule provided at Appendix C of the Local Plan.

1.5 MGH is promoting the strategic allocation of Gosden Hill for a residential-led, mixed-use development which will make a significant contribution to meeting the needs for market and affordable housing in the area, alongside employment and supporting facilities. Importantly, the development will support the delivery of a significant infrastructure package which will benefit both its future residents and nearby parts of Guildford and the Borough as a whole.
1.6 MGH welcomes the progress made by GBC in preparing the Local Plan and the intention of the plan being adopted by the end of 2017. MGH intends to participate in the Examination of the Local Plan to present the representations set out below.

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

Attached documents: 21633 A3 MK 16 07 18 - Covering Letter to Proposed Submission LP Representations.pdf (67 KB)

Comment ID: PSLPA16/4200  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am astonished that the evidence base consists of huge documents which much of the public would be unable to download. I object to any document in the evidence base in excess of 5mb in size.

I object to the housing number of 693 houses per year from the West Surrey SHMA is far too high. The calculations are not transparent and therefore not verifiable. The assumption that GL Hearn have acted for numerous local authorities and “it’s been ok” is not acceptable. As a scientist I cannot support this document and object to its use in any form and its inclusion in the evidence base.

I object to the fact that insufficient consideration has been made for the constraints in this borough, be they infrastructure in nature, AONB, THBSPA, Green Belt, water supply etc.

I object to the disproportionate (in terms of population density) allocation of housing to the north east of the borough in the wards of Clandon and Horsley and Lovelace in particular.

I object to the significant use of the green belt for site allocations. I object to any allocation being made before a housing number has been accepted. You need to start at the beginning, properly determine the number and THEN decide where to put the housing and what infrastructure is needed.

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

Attached documents:

Comment ID: PSLPA16/4209  Respondent: 8944929 / A Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 inferior, inadequate and subjective documents in the evidence base.

In particular I object to the LAA, which is inconsistent in the extreme and incomplete, citing for example land considered for schools which has not been considered for housing despite being brownfield, in excess of 50ha and close to the railway. [eg site at Newmarsh Farm East Horsley – clearly brownfield due to lack of enforcement]. It is also highly subjective and open to challenge.
I object to the Borough Infrastructure Delivery Plan, which is incomplete, lacking in detail, not properly costed eg £5-£10 million or even worse £100-£250 million and relies on funding that is not allocated by central government and is more of a wish list than anything else.

I object to the use of the Green Belt and Countryside Study in all its volumes and addenda. Why is it that some sites are excluded because they weren’t identified in the Green Belt and Countryside Study despite numerous volumes and addenda? Why is it that some sites may impact the TBHSPA when they are outside the 5km zone are excluded (nothing to do with the size of site) and some sites are inside and indeed outside the zone but included? (again not to do with the size of site). It just appears to be inconsistent and subjective – quite possibly a desk-based study which has not been verified or cross-checked. This is unacceptable.

I object to the fact that modern building techniques appear to have been ignored such that there is almost no housing proposed for the town centre “due to flood risk”. In many other parts of the country this risk has been completely mitigated.

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

Attached documents:

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<th>Comment ID: pslp173/674</th>
<th>Respondent: 8944929 / A Jefferies</th>
<th>Agent:</th>
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1. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

2. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

3. The AECOM work to support the ELNA is a poor piece of work riddled with unsupported assumptions.

6. I object to the continued use of the Green Belt and Countryside study as part of the evidence base. It is a subjective and inconsistent document that pays no regard to the impact of the current proposals on the setting of the AONB for example.

7. The transport evidence provided shows an increase in congestion as a result of the planned developments. Insufficient modelling has been done to satisfy me that any of the strategic sites can move forward on this basis. The consequences are severe to residents of Guildford and those much further afield.

13. There is no evidence that cross-boundary options beyond the green belt have been considered as a viable option instead of moving the green belt boundaries within the borough.

6. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

8. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

41. I object to the variation in the assessment of sites which is extremely inconsistent. In some cases the TBHSPA appears to be a concern whereas in others it isn’t. The same applies to a number of elements including impact of conservations areas, SNCIs, views in and out etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPA16/825</th>
<th>Respondent: 8945793 / Helen Bell</th>
<th>Agent:</th>
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I strongly object to the proposals contained in the Draft Local Plan.

The suggested building figure increase of 693 houses a year is far too high and is purely based on inaccurate assumptions. Will the Council disclose how they have reached this figure?

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

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<tr>
<th>Comment ID: PSLPA16/2086</th>
<th>Respondent: 8946593 / John &amp; Sheena Preston</th>
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The strategic housing market assessment is proposing a level of development that is too high and the underlying assumptions are based on misinterpreted data. The proposed level of expansion greatly exceeds those proposed by neighboring authorities. The ensuing development will greatly increase housing density thus making a major, detrimental, change to the area.

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

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<th>Comment ID: PSLPA16/3850</th>
<th>Respondent: 8948385 / Gillian Eve</th>
<th>Agent:</th>
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It is based on a target increase in housing stock which far exceeds the expected growth in the population as projected by ONS. The SHMA, which underpins the whole of the proposed local plan, is not fit for purpose and should be excluded from the evidence.

It allows widespread development that will harm biodiversity across the borough. The Green Belt and Countryside Study is not fit for purpose and should be excluded from the evidence.

The Strategic Highways Assessment is not fit for purpose and should be removed from the evidence. Its methodologies grossly underestimate current traffic levels and therefore the impact of further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. Unrealistic and Overstated Housing Targets

I consider the Annual Housing Targets to be grossly overstated particularly in light of the recent Brexit vote and the new government’s stated determination to bring immigration under control. The ONS and GL Hearn population and housing demand forecasts are already based on levels of migration much higher than the long term 2000-2012 trend and it would be foolish to presume that these high levels of migration will now be realised. And it cannot be right that the current Local Plan effectively calls for Green Belt to be sacrificed now to accommodate people who have yet to arrive in the UK.

The methodology and assumptions used in the GL Hearn forecasts have not been revealed (even, as I understand it, to GBC local councillors) and consequently no independent oversight is available to confirm the plausibility and quality of the housing forecasts they have developed.

It is not clear why GL Hearn have separately counted the demand for employment housing, as the ONS demographic forecasting process already includes macro-economic effects in their modelling of inward population movements to the region. Identifying employment housing and adding it to the housing demand from the ONS population forecast therefore looks like double counting.

No assessment appears to have been made of the ability of the regional and national building industry to deliver the very large and sudden expansion in new home building called for in the Plan. Since the industry has reported difficulty in sourcing capital, labour, and building materials as a major reason for its inability to deliver even the more modest housing targets of recent years, it is pertinent to question whether the resources (including public and private sector investment capital) exist to deliver anything remotely approaching the Housing Target set out in the Local Plan. Brexit will also reduce the supply of low cost manpower from Europe that the building industry relies on.

To summarise:

- the so-called ‘Objectively Assessed Need’ for new housing is much higher than the new post Brexit situation warrants
- the Housing Target should be revised to a much lower, but implicitly more realistic, number
- this implies that the requirement for residential development on Green Belt land will be much reduced, ideally to

2. Lower Post-Brexit Economic Growth

The consensus among economic forecasters is that Brexit will lead to lower than previously forecast economic growth and so your forecasts of employment and demand for business and commercial space are likely to be significantly overstated as the ONS macro-economic forecasts will have been based on pre-Brexit assumptions.

Given reduced need for business and commercial space, more brownfield land is likely to be available for residential development, further reducing the need for Green Belt development.

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

**Attached documents:**
I write to object in the strongest terms to draft plan that suggests some 13,860 new homes will be needed in the coming years. How on earth has this number been arrived at?

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

Attached documents:

The evidence for the need for expansion is exaggerated and flawed as is shown clearly by the GRA report on housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object most strongly to the excessive housing target numbers set out in the Revised Local Plan. These numbers were set at a time when the UK was expected to remain within the European Union and according to Councillor Spooner were based on that assumption. Following the Brexit vote on June 23rd the UK will be subject to reduced immigration and, according to many independent organisations, significantly reduced growth, so the numbers must be revised downwards to reflect this. I understand that Councillor Spooner has promised that not only this will be done, but that the numbers will be revisited to take into account the 2014-based population and household projections. I must also insist that since the latter would also have assumed that the UK would remain in the EU, these numbers must also be adjusted to reflect the Brexit vote before being used in the re-calculation of the target housing numbers.

I also object to the fact that the calculations behind the numbers have not been made transparent. It beggars belief that given that the whole plan is based on these numbers, Guildford Borough Council has not examined these in more detail and is apparently prepared to accept them at face value. Does the Council not expect some detail of how a developer claims he will accommodate a particular number of homes on a particular site? Of course they do! Given the amount of time & effort that has gone into this plan, and the difficulty the Council has clearly had finding suitable sites I find it extraordinary that the Council has not examined this number in more detail and verges on negligence.

I object to the overprovision of housing provided for in the Local Plan 2016. The plan provides for approximately 31% oversupply of the OAN number while making no allowance for infill housing that is not envisaged by the Local Plan, rather seeing this infill is seen as ‘windfall supply’ or should that be oversupply. If the Target numbers are to be recalculated as discussed in Section 1 above this oversupply may be around 40% or more. Whilst I can understand a desire to allow for some sort of oversupply in the short term it seems madness to allow for oversupply some 17 years into...
the future. No one can see that far ahead, three different governments will have come and gone by then and policies will have changed. The fact is that any substantial sites which identified in the plan will inevitably lead to housing blight in their immediate vicinity until they are identified as not required. The Council must make decisions and eliminate some sites before the Plan is finalised.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3674  **Respondent:** 8954977 / Patrick Sheard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. Housing Numbers

**The Ripley Society objects most strongly to the excessive housing target numbers set out in the Revised Local Plan.** These numbers were set at a time when the UK was expected to remain within the European Union. Following the Brexit vote on June 23rd the UK will be subject to reduced immigration and, according to many independent organisations, significantly reduced growth, so the numbers must be revised downwards to reflect this. The Society understands that the Council has promised that not only this will be done, but that the numbers will be revisited to take into account the 2014-based population and household projections. It must also insist that since the latter would also have assumed that the UK would remain in the EU, these numbers must also be adjusted to reflect the Brexit vote before being used in the re-calculation of the target housing numbers.

1. Calculation of Housing Numbers

**The Society also objects to the fact that the calculations behind the numbers have not been made transparent.** It beggars belief that given that the whole plan is based on these numbers, Guildford Borough Council has not examined these in more detail and is apparently prepared to accept them at face value. Does the Council not expect some detail of how a developer claims he will accommodate a particular number of homes on a particular site? Given the amount of time & effort that has gone into this plan, and the difficulty the Council has clearly had finding suitable sites we find it extraordinary that the Council has not examined this number in more detail.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/144  **Respondent:** 8956481 / A J Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Evidence base

The latest SHMA 2017 still inflates the housing figure because it is based on an excessive calculation of need and fails to apply appropriate constraints. GBC have contravened government guidelines by agreeing that G L Hearne and its subcontractor have intellectual property rights in the detailed analysis so not even GBC and the councillors know how the figure was calculated. It seems that migration has been over-estimated but in the absence of information it is impossible to verify. A report by experts NMSS dated June 2017 commissioned by Guildford Residents' Association concludes that
population growth had been substantially over-estimated and that on correct analysis the number of homes required should be substantially reduced.

The Carter Jonas Retail Study Update 2017 lacks credibility. The failure to implement existing retail consents in North Street for 10 years undermines the argument that there is demand for more retail space and no account is taken of the trend for consumers to buy on the internet rather than visit a shop. The potential for residential development in the town centre has therefore been under estimated as has the potential for development of brownfield sites.

There is no overall strategy for the town. The Town Centre Masterplan commissioned by GBC from architects and planners Allies & Morrison has been deleted as a source document despite having been adopted by the Council.

The Employment Land Needs Assessment 2017 lacks detail and analysis of different use classes B1(a), B1(b), B1(c), B2 and B8. Since the employment requirements of these use classes differ significantly the ELNA is deeply flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/4468  **Respondent:** 8956577 / John Jackman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am a long-standing resident of Guildford and moved to Tilthams Farm in 1983. I attach a set of papers led by a letter to Carol Humphrey dated 23rd November 2013 (which sets out how I became involved in the Town Planning project on this round) following which I had a meeting with Heather Sandall on 3rd March 2014 - I had not received a reply from Carol. I am not good on websites, but I understand that my land does not currently appear on your plans.

Since 2014 I have received advice that, in due course, even if not immediately, you are short of available grounds for housing and that, as my land adjoins and has a drive to the roundabout close by the Crematorium, it would be of use to you.

Having given further consideration with my family and taken professional advice two things arise.

I attach a further plan which shows, in yellow, the field opposite the roundabout and also shows land not previously referred to which is coloured blue and which we own.

My correspondence shows my family's commitment to the farm, outlined in red on the plan (altogether we farm some 55 acres including farming and taking care of some 25 acres of National Trust meadow, outlined in brown on the plan).

Looking to our own future, we should like to apply to build a house on the land marked in blue for ourselves for the future, for which we would be prepared to offer the upper (and higher, flat) part of the land marked in yellow for your housing purposes.

Could you please give consideration to our proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  ![letter2.png](253 KB),  ![map1.jpg](107 KB),  ![map2.jpg](138 KB),  ![letterrr.png](90 KB)
In response to the current proposed local plan I wish to express my views, concerns and objections.

**Housing**: I object to the proposed number put forward. The figure is excessively high, based more on supposition and suggestions than real hard evidence. Whilst there is a need for some new housing, especially for key workers, social housing, first time buyers and those empty nesters who wish to downsize, this need would not come close to the numbers currently being proposed. I object to the size and location of some proposed sites, especially within the greenbelt. Brownfield sites need to be utilised more efficiently.

**Brownfields sites** - residential properties v retail/office space. I object to the ratio suggested. The Internet has changed, and will continue to change, the way people not only shop (on-line with home delivery) but many office based businesses now do and will increasingly rely on "virtual offices" or conference calling methods. Whilst the "Head Office" might be in Guildford the need for all staff members to be located there would not. The same with many IT/researched based Companies. Demand for retail and office space will decline pro-rata. I have already witness first hand empty office and retail spaces both within and outside Guildford itself. A greater proportion of brownfield sites, especially in Guildford Centre, should be allocated to residential properties to house those in most need locally - at truly affordable prices.

Whilst the NPPF appears to offer the ability to protect against "garden grabbing" I could not see anything specific in the policies to this effect. I demand there is specific wording making this totally clear when the final plan is drawn up.

**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 Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4522  Respondent: 8967233 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Luke Vallins)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

**Strategic Highway Assessment Report**

The Strategic Highway Assessment Report (SHA) presents the findings of a technical assessment by SCC using their strategic transport model (SINTRAM) of the worst case highway impacts of the quantum and location of development set out in the Proposed Submission Local Plan.

It assesses forecast impacts on the strategic highway network in 2031, taking into consideration key local highway schemes, as well as strategic schemes included in the Department for Transport’s Road Investment Strategy (RIS) (March 2015) for Road Period 1 (M25 junction improvements) and Road Period 2 (A3 widening through Guildford).

We note that, while recognising that it is a highway-only assessment that does not take into account the potential for mode shift due to investment in sustainable travel, the SHA concludes that, “to accommodate Proposed Submission Local Plan-related vehicular trips the DfT’s RIS schemes would be required.” It also concludes that, “to avoid (severe impact) occurring in such circumstances of the RIS schemes not being forthcoming, then the quantum and location of development as proposed may have to be amended.”

The University has identified a number of technical concerns that may call into question the findings and ultimate conclusions of the SHA. These are set out below:

• The trip generation for the large sites does not include any consideration of the effect of pass-by and diverted trips or of the effect of internal trip For a development the size of Blackwell Farm, with a mix of uses that are likely to result in significant internalisation of trips, the overall trip generation should be reduced to reflect these factors. Taken together with the other large sites with mixed uses such as Gosden Farm, Wisley Airfield and the land to the south of Normandy and north of Flexford, the overestimation is likely to be several hundred vehicle trips in each peak. The SHA acknowledges that the large sites will generate trips that are wholly contained within their boundaries, for example school trips.
• The SHA does not take account of the reduction in car trips likely to come about as a result of improved sustainable transport measures. The SHA notes the positive impact of these measures at paragraph 4.18 and states that the “impact of these sustainable transport schemes is expected to be significant”
• The SHA appears to underplay the benefits of local highway improvements in Scenario 3, which, for example, result in a reduction in vehicle kilometres in both peaks as fewer vehicles take indirect routes on the local road network to avoid congestion getting onto the trunk road network.
• The SHA attaches limited weight to the negative effects of Scenario 5 in terms of increased car use overall attracted by the provision of additional capacity on the strategic network. The capacity improvements appear to attract additional vehicles to the network that are unrelated to development.
• Blackwell Farm creates fewer areas of new congestion on the highway network, in contrast to the other major development sites, although the impacts around the hospital need careful consideration.
• Detailed assessment work for any future applications will identify additional locations for local highway improvements and other mitigation measures, which are not considered in the SHA, but which may further reduce the impacts of development.

Furthermore, the University believes that the broader sustainable transport benefits of development at Blackwell Farm should be considered and acknowledged. These include:

• The ability to deliver homes, employment, schools and a mix of other uses on a single site that is uniquely well located in comparison with the other major sites
• Proximity to existing high frequency public transport services and to the university, hospital and other existing employment uses, reducing the need to travel by car
• The potential to support delivery of a new rail station on the North Downs Line providing direct services from West Guildford to Guildford, Reading and Gatwick Airport
• A masterplan that encourages non-car travel by providing a fine grained network of walking and cycling routes, home zone principles in all residential streets and primary streets that accommodate generous footways, new bus services and the Sustainable Movement Corridor
• The allocation of a significant proportion of homes for those that live and work locally (at the University, research park and hospital), further reducing the need to commute by car
• Local centres that will provide a range of services and facilities (such as shops, cycle hire, remote office hubs, courier drop/collection points, cafés and meeting spaces), further reducing the need to travel outside the site
• Parking measures to help with travel demand management, such as priority parking for car sharing at offices, car club bays and electric charging points
• A scale of development that will allow for the implementation of other innovative schemes, such as the creation of a smart travel network that links smart devices and on-demand vehicles via an easy to use app and provides a service around the site and to local areas

In summary, the SHA focuses exclusively on worst case highway impact and does not take into account the significant reductions in car use achievable from mode shift as part of the other Local Plan evidence base work and our strategy for Blackwell Farm or of internalisation of trips. Moreover, the consequences of encouraging substantial additional car use in terms of reduced environmental quality, increased CO2 (around 25,000 additional tons of CO2 per year in comparison to the baseline) and encouraging more car based patterns of travel are not considered.

The Local Plan should reflect the fact that highway infrastructure requirements set out are based on a worst case assessment of highway impacts and that there must be flexibility in delivery. This should be reflected in the Local Plan Vision and in Policy I1 and Appendix C.

Nevertheless, the University recognises that further, more detailed assessment work will be required ahead of examination, such as identifying at what point widening of the A3 is triggered and what development can come forward ahead of this. In this regard, it will endeavour to provide technical assistance to GBC, SCC and Highways England wherever possible.

*Topic Paper: Transport*

*Appendix 4: Table showing the anticipated funding arrangements for transport schemes*
The University notes the infrastructure requirements identified in relation to Blackwell Farm (A26) in Appendix 4 of Topic Paper: Transport (and summarised in Appendix C of the Proposed Submission Local Plan) and makes the following comments in relation to these:

**NR2: New rail station at Guildford West (Park Barn)**

The University is fully supportive of the provision of a new rail station on the North Downs Line at Guildford West (Park Barn) and has provided technical support to GBC and Network Rail to enable a business case for this scheme to be developed.

The preferred location currently being promoted by GBC (the scheme sponsor) is adjacent to the Royal Surrey County Hospital near Egerton Road. This is now some distance from the development at Blackwell Farm, compared to the location previously proposed by the University, and therefore will be of direct if not greater benefit to the hospital and nearby development at Park Barn.

The University therefore anticipates part-funding the delivery of the station through a S106 contribution related to the development at Blackwell Farm, rather than fully funding this as suggested in the infrastructure schedule.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPA16/1712**

**Respondent:** 8971233 / Tim J. Harrold

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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The University notes the infrastructure requirements identified in relation to Blackwell Farm (A26) in Appendix 4 of Topic Paper: Transport (and summarised in Appendix C of the Proposed Submission Local Plan) and makes the following comments in relation to these:

**NR2: New rail station at Guildford West (Park Barn)**

The University is fully supportive of the provision of a new rail station on the North Downs Line at Guildford West (Park Barn) and has provided technical support to GBC and Network Rail to enable a business case for this scheme to be developed.

The preferred location currently being promoted by GBC (the scheme sponsor) is adjacent to the Royal Surrey County Hospital near Egerton Road. This is now some distance from the development at Blackwell Farm, compared to the location previously proposed by the University, and therefore will be of direct if not greater benefit to the hospital and nearby development at Park Barn.

The University therefore anticipates part-funding the delivery of the station through a S106 contribution related to the development at Blackwell Farm, rather than fully funding this as suggested in the infrastructure schedule.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Green Balance Review of Objectively Assessed Need (OAN)**

CPRE Surrey has commissioned Green Balance to review and supply an independent commercial opinion on the validity of the OAN housing figure of 693 given in the GLH Heam West Surrey Strategic Housing Market Assessment (SHMA) for Guildford, Waverley and Woking. Their report makes clear that they judge this document to be flawed and the OAN figure for Guildford to be too high. In view of the Green Balance evidence produced, this puts the credibility of the whole draft Local Plan in question. The over-estimation of housing need effectively makes the draft Local Plan unsound. CPRE OBJECTION.

Instead of the OAN recommended in the SHMA of 693, an overall reduction is suggested for this figure of 212 which results in a revised OAN of 481. Other areas for further investigation as to the validity of the 693 figure have been suggested. The summary of reductions recommended for the OAN for all 3 districts covered are shown in Table 1 of the enclosed SHMA Review on page 4.

CPRE does not accept that the constraints relating to development in this draft Local Plan have been properly assessed or taken into account. If they were, the OAN would be radically reduced and we estimate that there would be no need to use Green Belt land. GBC has indicated that the OAN figure which GL Hearn has produced takes account of constraints but gives no explanation of how this has been done. This whole topic needs to be investigated further.

CPRE is also not in agreement with the emphasis given to retail sector expansion and office and warehouse development at Guildford at a time of changing conditions in the market-place and a need for more urban housing. CPRE believes that the focus of attention on building in the countryside has been caused by a too high OAN figure and a refusal to allocate sufficient priority to the supply of affordable housing and flats in the town because building development in this category has been sidelined rather than given the attention it requires. CPRE OBJECTION.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPA16/4258  Respondent: 8973377 / Cassidy Slyfield Ltd. (Cassidy Slyfield Ltd)  Agent: Nathaniel Lichfield & Partners (Steven Butterworth)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  LP2016 Housing Market Assessment Tim Harrold.pdf (12.8 MB)
It is an excellent option for extending the Borough’s premier industrial estate which is in high demand and has no real capacity to expand through intensification.

Allocation History

The Draft Local Plan: Strategy and Sites (July 2014) took the North Slyfield Site out of the Green Belt and allocated it as a sustainable extension to the industrial estate for “light industrial (B1c) and / or general industrial (B2) and / or storage and distribution (B8)” uses (Site 63). The allocation is in Annex 2.

This was a sound, evidence-based allocation which should have been carried forward in the Submission version of the draft Local Plan in order to contribute towards meeting the need for additional employment land in the most sustainable and appropriate, strategic location.

In response to the Council’s consultations, there were very few negative representations to the allocation and a number of responses in support, including from the Guildford Society (see below).

Our client was very surprised that the Council has now changed its mind and instead is recommending reliance on employment allocations in the contentious strategic Green Belt sites at Wisley Airfield in Ockham and Garlick’s Arch in Send Marsh / Burntcommon. The stated reasons for the Council volte-face are that:

- there has been a reduction in the amount of additional employment land that is required since 2014; and
- “the site was not identified [for development] in the Green Belt and Countryside Study and is located within high sensitivity Green Belt”.

Previous Representations Submitted on Behalf of Cassidy Slyfield Ltd and Mr and Mrs Mostyn

Our client has previously submitted the following documents in support of removal of the North Slyfield Site from the Green Belt and its allocation for employment purposes:

1 Representations in response to Issues and Options consultation on Draft Local Plan Strategy and Sites, submitted by email and post (29 November 2013). These documents, which make both the case for removal of the North Slyfield Site from the Green Belt and allocation for employment purposes, comprise:

- Planning Assessment, including Landscape and Visual Appraisal and completed Local Plan Strategy and Sites Issues and Options Questionnaire (Annex 3)
- Executive Summary (Annex 4).


3 Letter dated 18 January 2016 responding to the public and stakeholder representations on the North Slyfield Site (Site 63) received by the Council following its July 2014 consultation in respect of the Draft Local Plan (Annex 6).

4 Letters and photographs to Councillors dated 6 and 24 May 2016 (Annex 7).

5 Briefing Note provided to all GBC Councillors in advance of the 11 May Executive Committee Meeting (Annex 8).

We attach further copies of these documents (for Officers’ convenience and to assist the Inspector’s consideration).

Outline of the Case for Employment Allocation of the North Slyfield Site and its Removal from the Green Belt

The case for the North Slyfield Site to be re-allocated for employment purposes and removed from the Green Belt can be summarised as:

Employment Reasons for Allocation
1 There is a quantitative need to allocate additional employment land in the Borough.
2 There is a qualitative need to provide additional employment land adjacent to SIE, Guildford’s premier industrial / warehousing location.
3 The North Slyfield Site would be more easily delivered than the other employment allocations.

4 The allocation of the North Slyfield Site would positively support other Council strategies.

Green Belt Reasons for Allocation
5 Development of the North Slyfield Site would not harm the Green Belt or landscape.

Site Characteristics Reasons for Allocation
6 The North Slyfield Site is preferable compared to the employment allocations in the Proposed Submission Local Plan.

Local Plan Consultation Responses
7 The allocation of the North Slyfield Site for employment purposes did not arouse a significant degree of opposition from the general public or other stakeholders. We address each of these key issues below.

There is a quantitative need to allocate additional employment land in the borough

As you will be aware, NLP is an acknowledged expert and market leader in the field of preparing and assessing employment land reviews across the UK, and is engaged in this capacity by numerous local planning authorities. NLP’s expert Economics team has reviewed the Council’s Employment Land Needs Assessment (ELNA) (2015) and associated documents in order to advise in respect of the Council’s assertion that there has been a reduction in the amount of additional employment land that is required in Guildford since the North Slyfield Site was allocated in the Draft Local Plan two years ago in July 2014. In particular, NLP has reviewed the methodology used in the ELNA to assess future employment land requirements in Guildford to consider whether it represents a robust approach.

The ELNA estimates there is a requirement for between 4.7 ha and 5.3 ha of industrial and storage land in Guildford during the period 2015 to 2033 (i.e. a maximum of only 0.3 ha of land each year over the life of the Plan). This has been adopted by the Council as the industrial allocation in Policy E1 (Sustainable Employment) of the Proposed Submission Local Plan to support industrial job growth during the plan period.

Assuming a plot ratio of 0.45 for industrial and storage land as used in the ELNA, this industrial requirement would enable the delivery of a maximum of only 23,850 sq.m of industrial and storage floorspace over the plan period, equivalent to 1,325 sq.m of floorspace per annum.

NLP’s review of the ELNA considered whether the methodology used in the study suitably meets the guidance for Housing and Economic Development Needs Assessments (ID: 2a) outlined in the Planning Practice Guidance (PPG). Overall, the methodology used in the ELNA was considered to largely meet the guidance set out in the PPG although some limitations to the study were identified which reduce the soundness of the requirements estimated for Guildford. These are: 1) reliance on historic trends to estimate future requirements and 2) limited consideration of local business and market conditions and needs to inform the future requirements.

The requirement for industrial and storage land in Guildford estimated in the ELNA was based on the assumption that recent trends of floorspace and job growth will continue into the future. This means if industrial job growth has outstripped industrial floorspace growth historically, this trend is assumed to continue through the plan period 2015 to 2033. In this context, the ELNA indicates that industrial job growth has outstripped industrial floorspace growth in the Property Market Area (PMA) for Guildford over recent years. This means that the amount of new floorspace that was estimated to be required to support the forecast growth in industrial jobs in Guildford was also at a lower rate, in order to reflect past trends, which contributed to the small requirement for industrial and storage land identified in the ELNA.

This trend of industrial job growth outstripping industrial floorspace growth was assumed in the ELNA to simply reflect that the current industrial floorspace in the Guildford PMA was being more effectively used, with this trend of increasing employment densities assumed to continue into the future. However, we assert that the lower industrial floorspace growth compared to industrial job growth in the Guildford PMA is just as likely to reflect that the delivery of new floorspace is highly inelastic compared to the creation of new jobs.
This means that the lower industrial floorspace growth compared to industrial job growth in the Guildford PMA is unlikely to reflect lower demand or need for industrial floorspace, but rather the difficulties of delivering new industrial floorspace to the market (e.g. due to land constraints or limited site opportunities). In fact, the ELNA supports the view that industrial floorspace growth in Guildford has not been at a high enough level over recent years to keep up with demand in the local market, stating the following in Paragraph 5.4.6:

“Consultations with property market experts suggested that the current supply of industrial and storage premises is not meeting existing demand. There is a lack of available sites and these sites tend not to deliver the quality and type of space occupiers need.”

If recent growth in the supply of industrial floorspace in Guildford is assessed to have not been high enough to meet demand in the local market, it is therefore reasonable to assume that the use of historic trends to estimate future requirements is not a sound methodology. This is therefore the key limitation of the methodology used in the ELNA, as it estimates a small industrial and storage requirement that reflects a historic under-supply of floorspace in Guildford. We consider that planning for such a small industrial land requirement in the new Local Plan would continue to under-supply the market and constrain the growth potential of businesses, which represents an unsound approach to positively planning for growth in Guildford.

In fact, the ELNA also recognises the possibility that demand for industrial land in Guildford is actually higher than the estimated requirements in the study. This is due to the supply of floorspace being highly rigid and unable to reflect increases in demand over the short term, with the ELNA stating the following in Paragraph 7.2.5:

“Demand for employment land within Guildford could be higher than these and land floorspace forecasts. Employment within the borough has the potential to grow more quickly than currently anticipated, while demand for additional space on the part of businesses already located within the borough could be higher given the extent to which employment densities have risen in recent years.”

This small industrial land requirement is not sound as it is not positively planning for growth in Guildford. This is particularly so in the context of the upper range requirement estimated in the ELNA (i.e. 5.3 ha of industrial and storage land) being 40% lower than the requirement estimated in the previous Employment Land Assessment (ELA) published in 2013 (i.e. 9 ha over the period 2013 to 2031) and 60% lower than the requirement estimated in the Council’s unpublished ELA prepared in 2014 (i.e. 13.9 ha over the period 2013 to 2031).

In this context, it is useful to consider the potential reasons why the requirement for industrial land in Guildford is said to have declined so substantially between the ELA (2013) and ELNA (2015). We note the ELNA included very limited consideration of underlying economic and market factors in Guildford when estimating the forecast industrial requirements. This contrasts with the ELA which did include some consideration of conditions in the Borough, which we believe improves the validity of these forecast requirements and better reflects national guidance in the PPG in terms of considering recent market signals when estimating future needs. Such underlying economic and market factors taken into account by the ELA includes prevailing gaps in the local market (e.g. the need for move-on premises and new, good quality premises), needs of local businesses in regards to the type of space they require to support their growth plans, and the future economic growth aspirations of the Council.

Taking these factors into consideration, the ELA estimates there will be an increase in demand of between 4 ha and 9 ha for industrial and storage land over the period 2013 to 2031. This forecast industrial requirement takes into account the fact there has been very limited supply of industrial premises in the Borough over recent periods, which is likely to have constrained business growth in the local market, as well as the fact the Council needs to “support innovation, new business and growth in all sectors and ensure we help the borough’s economy to diversify” [paragraph 4.3.9]. In addition, the risk associated with not delivering enough industrial space in Guildford is identified in Paragraph 4.3.10 of the ELA, stating that by not planning for an “increase in B2 floor space, we may discourage businesses from locating in the borough and may prevent existing businesses from expanding.”

Overall, we believe the approach used in the ELNA to estimate the forecast industrial and storage land requirement for Guildford has inherent shortcomings, which reduce the soundness of the forecast requirements carried forward in to the Proposed Examination Local Plan. This is highlighted by the surprising disparity in the range of the requirements
estimated over the past three years. The amount of industrial and storage land that should be planned for in the new Local Plan should be higher than the currently proposed requirement, in order to take into account underlying economic and market factors in the Borough that have not suitably been taken into account in the ELNA.

The failure to positively prepare to provide adequate employment land is also unsound because it is inconsistent with NPPF national policies to: contribute to building a strong and competitive economy [paragraph 7]; support growth and innovation [paragraph 7]; pro-actively meet the development needs of Guildford [paragraphs 14 and 20]; and pro-actively drive and support sustainable economic development to deliver the business and industrial units the country needs [paragraph 17].

The NPPF is crystal clear that “The Government is committed to ensuring the planning system does everything it can to support sustainable economic growth” [paragraph 19, our emphasis]. In failing to provide adequate employment land allocations, the Proposed Submission Local Plan clearly fails to do “everything it can” and is therefore unsound.

There is a qualitative need to provide additional employment land adjacent to SIE, Guildford’s premier industrial / warehousing location

In addition to this need for additional employment land across the Borough as a whole, there is a strong and urgent need to positively plan for additional employment land at SIE in the short term to ensure the premier industrial location in the Borough does not miss prospects to attract new businesses and retain existing, growing businesses. The failure to positively plan for expansion of the SIE also means that the Proposed Submission Local Plan is unsound.

The 2015 ELNA identifies a clear shortage of available employment land in the Borough to meet forecast requirements over the plan period, meaning new employment sites need to be designated to help stimulate future growth in the economy.

The recent ELNA refers to the Guildford Business Survey (undertaken in two phases in November 2014 and July 2015). That survey indicated that around one-third of businesses surveyed in the Borough were actively considering relocating, mostly within the Borough. Of particular note from this survey was the desire of businesses to relocate close to their current location with survey results showing that “industrial occupiers stated a preference for locating in Slyfield or a similar mid-urban industrial estate location”2.

This evidence base used by the Council to inform the preparation of the Proposed Submission Local Plan therefore points towards a strong need to positively plan for new employment sites in the Borough during the plan period that are suitable for meeting the existing and forecast demand for new employment space, with SIE identified in this evidence base as being a preferred location for industrial firms in terms of supporting their future relocation and growth plans.

However, the ELNA indicated that SIE currently has as little as 185sq.m of vacant industrial space, and limited prospects for intensification or additional space at the estate3. This premier industrial location in the Borough is therefore effectively operating at full capacity and has almost no potential to support future growth in the local economy as it presently stands.

In this context, the North Slyfield Site represents the only location that can enable sustainable industrial / storage growth at the premier industrial estate in the short term. While some light industrial (B1c) and ‘trade counter’ uses are allocated as part of the Slyfield Area Regeneration Project (SARP) to the east of SIE, this would not meet the requirements of industrial / storage businesses and operators. In addition, importantly, the Council’s own assessment identifies significant constraints to developing SARP. It is therefore unknown when SARP as a whole, and allocated Class B1(c) light industrial uses in particular, would come forward for development, but it certainly would not be expected to come forward during the short term (e.g. relocation of the sewage treatment plant alone is expected to take four years).

In the absence of additional employment land at SIE to enable the business community to grow organically, it can be expected the growth potential of SIE would remain constrained in the foreseeable future. Given the importance of the premier industrial location in the Borough, it can also be expected that such constraints will have a negative effect on the economic growth potential of the local economy as a whole.
The Proposed Submission Local Plan is therefore unsound because it fails to positively and pro-actively plan for economic growth as required by the NPPF, particularly at the strategic location in the Borough where there is most demand (i.e. “in the right place and at the right time” as required by the NPPF [paragraph 7].

The North Slyfield Site would be more easily delivered than the other employment allocations

It should be noted that, whilst Officers recommend allocations for industrial and storage uses at other strategic Green Belt sites in the Proposed Submission Local Plan (eg. Wisley Airfield and Garlick’s Arch – the latter literally added at the last hour4), these potential sites are likely to have greater risks in terms of take-up compared to the North Slyfield Site, given that they cannot draw on the market value of an established strategic industrial location. In fact the industrial / storage uses allocated at each of these sites (as well as the light industrial uses at SARP) form part of larger mixed-use developments with deliverability issues and which could also create compatibility issues between the housing and industrial uses supported at these sites, particularly in relation to heavier industrial activities. In contrast, the North Slyfield Site adjoins existing industrial activities and is set some distance and shielded from residents at Jacobs Well.

Further, the North Slyfield Site was the only industrial / storage allocation made by the Council that supported the industrial market in the Guildford Urban Area.

Again, the failure to allocate industrial / storage land “in the right place and at the right time” means that the Proposed Submission Local Plan is unsound.

The allocation of the North Slyfield Site would positively support other Council strategies

An employment allocation on the North Slyfield Site would support a range of other growth strategies and initiatives currently being brought forward by the Council.

As stated above, SIE is identified, in the ELNA, to be a preferred location for industrial businesses in terms of supporting their future relocation and growth plans. The allocation of the North Slyfield Site could therefore re-accommodate growing businesses in the Borough that want to be situated in Guildford Urban Area, which in some cases could release previously developed employment sites in urban areas for housing development. In their representations on the July 2014 Draft Local Plan, the Guildford Society supported allocation of the North Slyfield Site, partly because it could accommodate businesses displaced at town centre / housing allocations including those at Walnut Tree Close (allocations A5, A9, A10, A13 and A14, currently in use as builders merchants, industrial and warehousing).

The release of urban sites for new housing provision supports the Guildford Town Centre Vision (2014), which seeks to grow the provision of housing in the town centre. In addition, the support for new housing development at urban sites could help to ease pressure on releasing Green Belt land in the Borough to accommodate the required housing delivery.

Further, an employment allocation at the North Slyfield Site has the potential to help unlock SARP by relocating some of the existing or proposed industrial / storage / light industrial uses at SARP to the extended SIE. This would allow a greater proportion of housing to be delivered in SARP, and would ultimately boost the potential development value of the project.

In addition, the growth of the strategic industrial estate through this allocation would reinforce the case for bringing forward the proposed Clay Lane Link Road, as the allocation would underline the Council’s priority of supporting economic development at the premier industrial location in the Borough and the related need to improve the estate’s access to the wider strategic road network.

For these reasons the Proposed Submission Local Plan has not been positively prepared and is therefore inconsistent with the NPPF.

Development of the North Slyfield Site would not harm the Green Belt or landscape

The North Slyfield Site was not specifically assessed in the Council’s Green Belt and Countryside Study (2013), but formed 10% of a very large parcel of land referenced Land Parcel B3 (LP B3). LP B3 is too large (covering a bigger area than SIE) and varied in quality for any meaningful consideration to be given to the Green Belt boundaries around Jacobs Well and SIE. It includes within it a number of environmentally sensitive areas (i.e. River Wey floodplain, registered
When our initial 29 November 2013 representations (Annex 3) were received by the Council, Officers recommended and Members agreed that the North Slyfield Site should be taken out of the Green Belt and allocated for employment use in the Draft Local Plan (July 2014 consultation version). At that time, the Council agreed with our assessment of the employment, Green Belt and landscape issues. However, we consider that it would have been prudent if the North Slyfield Site had been formally assessed at that time, as a smaller Potential Development Area (PDA) (as many other sites have been, including those in high sensitivity Land Parcels B16, D2, D6, D10, E9, F3, H7, H8 and J7). Had the Council done so, the North Slyfield Site would have been found to be suitable for removal from the Green Belt and employment allocation via the application of the GBCS methodology for assessing:

- Stage 2: the degree to which the land contributes to the purposes for the Green Belt (see below).
- Stage 3: the sustainability credentials of the land.
- Stage 4: the environmental capacity of the land to accommodate appropriate development.

NLP’s Planning Assessment submitted to the Council on 29 November 2013 reviews the North Slyfield Site and concludes that it performs well against these stages.

The Planning Assessment also provides a more detailed review of the North Slyfield Site’s development against the NPPF’s five purposes of Green Belt land and finds that it complies. In summary:

Jacobs Well and Guildford would remain physically and visually separate; and there would be no reduction in the existing minimum separation distance between them.

Development could be contained behind existing substantial boundary planting which, with limited enhancements, would screen new development in public views and maintain the visual gap.

Defensible boundaries prevent any further northward expansion of SIE and safeguard the countryside from further encroachment.

No impact on the character and appearance or setting of a historic town or conservation area.

Additional employment floorspace would assist urban regeneration of the SIE by strengthening its offer, role and attraction to businesses; and improve viability of SARP.

In addition, relocations of new or growing businesses on to an expanded SIE could release poorer quality brownfield sites for housing, which would relieve Green Belt pressures elsewhere.

The full Green Belt and landscape case is set out in NLP’s Planning Assessment and Landscape and Visual Appraisal reports submitted to the Council on 29 November 2013 (Annex 3). We suggest these should be thoroughly reviewed again before the Submission Local Plan is finalised and sent to the Planning Inspectorate.

Green Belt Comparisons

The GBCS reviews land parcels against four of the NPPF Green Belt purposes and scores them. The following table extracts the GBCS scores and commentaries for the large LP B3 (within which the North Slyfield Site sits) and also those for Wisley Airfield (LP C18) and Garlick’s Arch (LP B14). LP B3 gets a high score of 4; however, the North Slyfield Site within it scores lower than any of the LPs and should be prioritised because it performs better than the other sites in terms of the purposes of the Green Belt (as well as being in a location where there is existing demand and a need to expand the strategic employment site at SIE).

The GBCS study methodology is not robust when applied to the assessment of the North Slyfield Site. As noted above, in the GBCS LP B3 gets a high score of 4. However, we consider that this is erroneous. It should not receive a point for
NPPF Green Belt purpose 4 – which is “to preserve the setting and special character of historic towns”. The fundamental purpose of Green Belt policy is to prevent urban sprawl by keeping land permanently open. However, the GBCS gives LP B3 one point because it “preserves setting of River Wey conservation area”, which is not a historic town. This is wrong and LP B3 should score no more than 3 points, the same as LP B14 within which the allocated Garlick’s Arch site sits. This erroneous methodology undermines the Local Plan evidence base and is another factor contributing to the employment allocations within the Proposed Submission Local Plan being unsound.

Removal of the North Slyfield Site from the Green Belt would not harm the Green Belt, landscape quality or views and should be included in the Submission Local Plan consistent with national policies for the Green Belt as well as economic growth.

<see attached documents for appendix>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 13719 Proposed Submission Local Plan (Reg 19) Consultation Rep 18.07.16.PDF (8.3 MB)

Comment ID: PSLPA16/2870  Respondent: 8979265 / Rachel Taylor  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3774  Respondent: 8979969 / Robin Bowen  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Residents Association (CRARA).

I object that, unlike other places, Guildford is choosing not to constrain its overall growth. Expansion should be constrained to protect the character of the town.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/3451</th>
<th>Respondent: 8997345 / Eileen (Lee) Cartwright</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The level of planned house building of 693 houses up to 2033 seems excessive and no clear explanation of its calculation has been given. Road and rail capacity in Guildford is already insufficient.

As a resident of the Tyting area I see the congestion and near miss traffic accidents as well as the regular actual traffic accidents on our narrow lanes which struggle to cope now, larger volumes of traffic will increase the stress to these lanes which are used by Waverley residents as a cut through as well as by Guildford residents. This is an Area of Outstanding Natural Beauty close to Guildford which needs to be protected.

Other borough councils nearby appear to be restricting their overall housing target yet Guildford is not. Surely the beautiful character of our town should be protected?

**Green Belt and Countryside Study**

I oppose the use of Green Belt areas as unjustifiable development areas. All parties promised to ‘protect Green Belt’ in the election.

The use of brownfield sites should be implemented more.

**Transport Evidence**

Plans to ease congestion and aid flow of traffic in and around Guildford do not yet seem to address all the issues which have been raised such as another river crossing and a central bus facility.

**Guildford Retail and Leisure Study**

Attracting the big names to Guildford High Street is a good thing for the town, but the proposed 40% increase in shops seems excessive (in the age of increasing online shopping it seems hard to justify this). More campus accommodation for students and central homes for the elderly (which may free up larger family properties) would seem not to be addressed and is very much needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPA16/38</th>
<th>Respondent: 9002593 / Brett and Susan Whitby-Smith</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The availability of school places I understand is as follows:

**Kings College, Guildford.** The school is currently **57% undersubscribed.** The capacity at the school is 900 pupils, and there are only 389 on the school roll (43% utilised) with 511 vacancies.

If Kings becomes fully subscribed, there is capacity on that site to further expand the school, to accommodate more pupils.

**Christ's College** is already taking 30 more pupils a year than its admission number, because it has the space and capacity to do so, and is willing to take more still as it has further capacity.

**Ash Manor, Ash**

Very much local to Normandy, the capacity of the school is 1,050 and it has 940 pupils, so is **undersubscribed by 110 places.**

There is potential for the school being expanded to take more pupils by 30 places a year (so a total of an extra 150).

**Connaught School**

This is near Ash, but just over the County Boundary in Hampshire - but is also **undersubscribed by 90 places** and available to Surrey children.

**Hoe Valley Free School, Woking.**

This brand new Secondary school only opened last September. It has an intake of 120 per year, with currently 95 pupils, so is **undersubscribed in its first year by 25.** But it will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although will mainly serve Woking, will welcome applications from Guildford parents.

**The New Guildford University Technical College**

This is due to open in 2018, and will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools.

The birth rate in Guildford has fallen over the past two years. This trend may or may not continue, it is another factor to consider.

The Green Belt in Normandy and the surrounding area is serving its purpose well.

To the West, Camberley, Farnborough, Aldershot, Ash, Tongham and Farnham are effectively one area or urbanisation, only the road signs tell you have moved from one town to the next.

Currently it is the green belt round Normandy & Pirbright that is stopping this conurbation merging with Guildford & Woking in the east.

The local roads are not currently coping with the current levels of traffic, on normal days there are long queues on the A323 & the A31. Days when there are problems on the A3 (not unusual) the whole area is stationary, which can last hours.

Both Glaziers lane & Westwood lane that border the proposed development are narrow country lanes and have little street lighting. Westwood lane has a single carriage limited height railway bridge. The bridge over the railway at Wanborough station is at an angle, effectively producing a chicane, the bridge has also subsided greatly and has been underpinned twice in the years I have lived here. The narrow pavements are only on one side of the roads and swap sides.
The pedestrian bridge at the station is not suitable for disabled access to the East bound platform. The development proposal will give access to the East bound platform. However a passenger arriving on the East bound platform will have to travel almost 1 mile to access the West bound platform for the journey home.

The proposal that both the 1100 residents and the 1500 pupils will mainly use the railway is clearly fantasy, just stand outside any school in the area and count the cars that deliver children.

The stream that cuts both Westwood lane and Glaziers lane floods the road from time to time.

The Wanborough station access quite frequently floods.

The development in Normandy is so close to Ash & Pirbright Heath lands (THB-SPA) sites of SSSI’s and Surrey Hills AONB that its negative impact needs to be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I believe the assessment of housing numbers required to be mistaken (and too high). There have been countless requests to check the numbers but I do not believe there has been any robust or credible test to date. Even if the number was incorrect before 23rd June 2018 Brexit will demand a new revision (downwards). I do not believe it to be in the best interests of local residents anywhere in the borough for the council to agree such a radical transformation or destruction of greenbelt based on a questionable housing target.

The Metropolitan Green belt is more than a lovely gift from our forefathers - building on it means an irreversible loss of: agricultural production; Rural leisure and tourism amenities; Water catchment; Flood control; Biodiversity; Natural heritage; Natural landmarks; p2 open space; rural views - all of which bring very real benefits to public health and wellbeing, physical and psychological.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/324  Respondent: 9052129 / Sue Wright  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Draft Local Plan: Strategies and Sites June 2016

Firstly, I think any estimates of numbers of new housing should wait until we see the impact of the UK’s exit from the European community has, hopefully net migration will start to decrease and then I doubt that so much new housing would be needed anywhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3805  Respondent: 9052673 / Beverley Nash  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. There is an ERROR in the Land Availability Assessment dated February 2016, and I ask that GBC corrects this. There is a plan on page 299 that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will be opposed by residents and will not be granted by the Manor Close Residents Association.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2309  Respondent: 9069121 / E Short  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
GEF also highlight that there is **no objectively assessed need for housing yet established**, since the figure used is based on a Strategic Housing Market Assessment that is **not transparent in its methodology**. This clearly denies us, the public, the means by which to assess the veracity of the conclusions drawn by the assessors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/4390</th>
<th>Respondent: 9078881 / Jean Trickett</th>
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<td><strong>HOUSING NUMBERS</strong> - far too many houses are being proposed with no reason given as to <strong>WHY THE NUMBER HAS DOUBLED since 2012.??</strong> Where is the evidence that 14,000 new homes are required??</td>
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<td><strong>Housing requirements</strong></td>
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<td>The basis on which the housing requirements have been assessed appears to be flawed so that the requirement for 693 homes to be built per annum is overinflated. The council have failed to allow access to the demographic and economic models used so that proper checking has been impossible. The housing target needs to be constrained.</td>
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<th>Comment ID: PSLPA16/1370</th>
<th>Respondent: 9081089 / William D Barker OBE</th>
<th>Agent:</th>
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<td><strong>I object to raising the annual number of houses built per year with no rational reason given. One must assume these are developers numbers for financial gain and not for social need</strong></td>
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I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

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? ( )

It is not a full and valid consultation unless the methods by which the consultants arrived at the proposed housing numbers are explained to the public and therefore open to full scrutiny. There is a large increase in the housing numbers in comparison with the earlier plan in 2014, but we are not told the reasons for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2968 Respondent: 9237953 / Patricia Wood Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that the Borough Council is using arbitrary figures, produced by G. L. Hearn, who used an undisclosed formula, to propose building nearly 14,000 houses in the Borough. The Borough of Guildford does not NEED this number of houses and we, the current residents, do not WANT them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3187 Respondent: 9243073 / John Hartley Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Dear Sir or Madam, I wish to comment on the proposed local plan. I feel the new housing target of over 690 new houses per year is no longer realistic, post the Brexit vote & the downward pressure caused by a reduction in immigration. There is also likely to be a house price correction, so it would be crazy to build large housing estates where the developers go bankrupt halfway through construction (as happened in Spain).

A more realistic target, is just to build for local need. That would be in the region of 300 houses per year.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1161 Respondent: 9298465 / Peter Grover Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1163  Respondent: 9298465 / Peter Grover  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base.
and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/861</th>
<th>Respondent: 9299745 / Simon Runton</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>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 not been open and transparent and is more than double the figure used in previous plans.</td>
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<tr>
<th>Comment ID: PSLPA16/4370</th>
<th>Respondent: 9332545 / John Chalmers</th>
<th>Agent:</th>
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<tr>
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<tr>
<td>Proposed Submission Local Plan: strategy and sites 2016</td>
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<tr>
<td>In response to the above, I list below my comments and objections as follow:</td>
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<tr>
<td>The Housing number of 693 seems excessive and I cannot find from your documentation how GBC and/or it’s Consultants have arrived at this figure for the SHMA. It appears (as I understand it) that even GBC do not know how this number was reached and are fully dependant on a third party consultant's software that only they understand. Surely this is wrong and would not stand scrutiny at any inspection by the Planning Inspectorate come December.</td>
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<td><strong>With this in mind, I object to the housing number.</strong></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: PSLPA16/1567</th>
<th>Respondent: 9607905 / Anne Pascoe</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to (to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/180  Respondent: 10223105 / Vincen Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to submit the following comments and concerns regarding the latest version of the local plan.

- I believe the annual number of houses being proposed each year is too high and needs reducing as the current number does not stand up to detailed scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/252  Respondent: 10281569 / Alison Sutherland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a local resident at 19 Sime Close, Keens Lane, Worplesdon, Guildford I would like to add my voice and opinions to the new draft local plan please:

The SHMA is significant and should be reviewed to reflect the amount of housing built in Guildford over the last 5 years as opposed to an inflated number: by reducing the proposed 690 new builds to 250 this would reduce the need for the use of Green Belt as 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: PSLPA16/721</th>
<th>Respondent: 10423265 / Jillian Tallick</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>

9. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
<th>Comment ID: PSLPA16/3198</th>
<th>Respondent: 10430401 / St John the Evangelist (Mark Woodward)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>

I OBJECT TO the lack of any evidence for the alleged housing need numbers. Numbers based on growth and demographic data now invalidated by Brexit. • No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure. • 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account. No reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units. • High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

<table>
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<tr>
<th>Comment ID: PSLPA16/3039</th>
<th>Respondent: 10560737 / Miriam Tarron</th>
<th>Agent:</th>
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</table>

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/300  Respondent: 10565569 / Sheila Mardle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 EVIDENCE FOR THE ALLEGED HOUSING NEED NUMBERS. THE FACTS JUST DO NOT ADD UP.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1587  Respondent: 10568769 / Steve Trowbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In terms of housing demand, I do not believe that the rate of population growth in the Borough has been accurately modelled. Commentators have recently identified falling numbers of people leaving London for nearby towns and villages. Also until the terms of Brexit have been established I do not believe that anyone can accurately model or forecast demand as the key parameters of immigration/migration and economic demand are now unclear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1633  Respondent: 10570049 / Jenny Peachey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green The way student's economic need and affordability are calculated inflates the housing need. I believe that the SHMA of 2015 is highly questionable as the number of foreign students has been wrongly used to inflate the housing need. The figure of 13,860 houses is excessive, as a population increase would only need about 8000 homes at an average of 2.5 persons per house. About half of these houses could be built on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/1680  Respondent: 10615137 / Nav Nair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like more transparency on housing demand. From what I understand, the calculation has not been shared and seems disproportionately high versus the national estimates for population growth for the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1796  Respondent: 10616321 / Petrina Jeffreson  Agent:

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 ANY evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2183  Respondent: 10616321 / Petrina Jeffreson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/558  Respondent: 10617441 / Graham Sykes  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
3) 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/560  
**Respondent:** 10617569 / Lydia Sykes  
**Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3050  
**Respondent:** 10619169 / Wendy Critchlow  
**Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and
significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2332  Respondent: 10620801 / E. H. and J. A. Strange  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO the limited consultation period
I OBJECT the last minute inclusion of new sites with less than 2 weeks notice.
I OBJECT TO the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2606  Respondent: 10620801 / E. H. and J. A. Strange  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4243  Respondent: 10627457 / Graeme Morrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

CONTEXT
Firstly it is necessary to understand the context of the plan, particularly as it relates to the Horsleys.
The basis of the plan
A consultancy, GL Hearn, produced the SHMA but have not disclosed to the Council or to anyone else details of the input assumptions or mathematical model on which their calculations have been made. That their forecast is 70%
above that of the accepted figure from other sources may give you some cause for concern. Without a full understanding of the assumptions, you cannot be sure that your plans are firmly based. This is not the right way to manage such a critical input to the local plan and as a consequence your predictions lack credibility.

SPECIFIC OBJECTIONS

I object to the basis on which the housing requirements have been calculated. As they are not transparent they lack credibility.

I object to the final target housing number (based on a mathematical model which has not been disclosed) which is 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?

Attached documents:

Comment ID: PSLPA16/3826  Respondent: 10638209 / Wendy Rockhill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the raising of the annual number of houses built each year. With no rational reason being given, one must assume this is being done for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1013  Respondent: 10638241 / Irene M Bleach  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/474  Respondent: 10646753 / Jenny Mackenzie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3227  Respondent: 10653537 / Mike Elrick  Agent: 10653537 / Mike Elrick

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Further to a previous comment, please note the following comments, based on the background "topic" paper on Housing, dated June 2016.

para 4.172 states "The effectiveness of the plan is partly measured by the ability to demonstrate a five year supply of deliverable housing land..." Although it will be for a Planning Inspector to determine the effectiveness of the Local Plan, it does seem, from the Council's own figures, that the Plan is not sufficiently robust.

para 4.12 The Council does not appear to have attempted to record brownfield land in its area. This is fundamental within the NPPF.

para 4.15 I am able, by reference to a specific example, to demonstrate that the LAA does not identify "all sites that are suitable, available and achievable for housing..."

para 4.59 This paragraph does not adequately identify the specific Court of Appeal judgement. It is possible that it refers to Neutral Citation Number: [2016] EWCA Civ 168 : 17 March 2016 (aka Richborough Estates Partnership LLP). That landmark judgement applies to all housing policies, of which settlement boundary is a comparatively minor one. Currently, Guildford's "out of date" Green Belt policy has much more relevance to the Local Plan. The judgement is currently resulting in many planning appeals being allowed, both locally and nationally.

para 4.60 To describe a density of 50 dwellings per hectare, in a village, as acceptable - but "relatively high" must be highly questionable.

para 4.124 This site has been reintroduced, after being quietly omitted from the previous draft plan in 2015. The circumstances are particularly questionable because the site is part owned by the Council. It is not accurate to say that the site will be "removed" from low sensitivity Green Belt. The site will remain in the Green Belt, but will be built upon.

What is meant by "one of our more sustainable villages"?

para 4.155 Every figure given in the table is significantly "rounded". There are no step changes. It is very unlikely to be based on any realistic assessment of a timeline for housing completions. Its only purpose appears to be justification for a total number of 10,395 dwellings.

para's 4.156 and 4.157

These two paragraphs confirm there is to be no realistic attempt to resolve the accrued backlog of housing as required by the NPPF. An Inspector will determine whether this is reasonable.

para 4.167 to 4.171

These paragraphs, above any others, clearly indicates that this latest draft Local Plan will not conform to the NPPF.

para 4.169 is an outrageous misrepresentation of data. It is stated that "For the last seven years, completions have been less than 300 homes per year. In reality, the highest number achieved was 262. The annual average for the seven years
is actually 203. [NB : The above statement would have been equally true if it had read "For the last seven years, completions have been less than 2,000 homes per year."

It should also be noted that annual housing completions in Guildford have reduced significantly since the introduction of the NPPF in 2012.

para 4.171 The statement "This is not possible to achieve during this period (2018/19-2022/2023) without significant harm to the Green Belt and other harm. This would require development of many high sensitivity Green Belt sites, which we do not consider a reasonable option" is a clear indication that the draft Local Plan will not conform to the NPPF. Why does the draft plan not contain such an "unreasonable" option for public consultation, utilising "low sensitivity" sites?

para 4.173 "As described above, it is imperative that an adopted plan is not immediately out of date due to lack of five-year supply of deliverable housing land – this would defeat the point of adopting a new Local Plan. The steadily increasing housing target enables a realistic prospect of a five year supply of deliverable housing land to be identified post adoption of the plan, and puts a plan in place that can significantly boost housing supply in Guildford Borough (as per the requirement of the NPPF)." This is simply an Invitation to an Inspector to find that the housing policies of the Council are currently wholly inadequate - but agree that, at some undefined point in the future, a magic wand can be waved.

In my humble opinion, the current Local Plan is unlikely to be adopted in its current form.

The Council has already been identified on a very small list of LPA’s whose Local Plans are not sufficiently advanced and are consequently at risk of Government intervention in 2017. One Local Plan was withdrawn without being submitted for examination. This second is likely to draw a similarly large number of NIMBY objections, possibly resulting in further delay. It is therefore possible that a calculated risk to prompt such intervention is being taken by Councillors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/245  Respondent: 10655361 / M Trevill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6I OBJECT TO the lack of evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4061  Respondent: 10663585 / Nigel Killick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the calculation of housing need, it is unsubstantiated. The model has not been scrutinised and fundamental assumptions are flawed.
I object to the housing target, it is unconstrained.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/1173  
**Respondent:** 10667073 / Trudi Harris  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

18. **I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)**

0 The "objectively assessed need" figure of 693 homes a year is too high.

0 A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to:

0 failure to correct for errors in the historical data for international migration flows,

0 issues with the way it considers students and affordability and

0 Flaws in the method for estimating the number of homes needed to support job growth.

0 It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/465  
**Respondent:** 10668897 / Mary Harris  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following key reasons:

I object to the lack of transparency displayed by the GBC in the calculation of the number of houses required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1472   Respondent: 10672417 / Matthew Kalupka   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3376   Respondent: 10682529 / Paul Edwards   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3281   Respondent: 10701537 / Ben Gamble   Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, over double the previous figure of 322 used in previous plans. The SHMA report methodology is inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1085  Respondent: 10702561 / Emily Gamble  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

12. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough as it is too high

The Plan concludes that 693 homes a year are required by the borough, over double the previous figure of 322. As the calculations of these figures are confidential one cannot scrutinise them, which is not democratic or transparent. One assumes student numbers have been used to inflate this figure. This is disingenuous. Whilst local students are studying they will not wish to stay out in Ripley and Send but on the outskirts of Guildford in shared accommodation. Once they have graduated they will most likely leave the area. I went to Cambridge University yet few of my contemporaries live within 50 miles of Cambridge.

These inflated numbers contravene the National Planning Policy Framework which allows the overall housing target to be reduced to take account of protected wildlife areas, landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to the area concerned.

The visceral reaction of appalled disbelief felt by all local people in response to the proposed Plan is supported by the above legal and logistical objections, and the Plan should be abandoned in its current form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1133  Respondent: 10717985 / Alison Drennan  Agent:
My more specific objections are:

- I object to the way GBC use the word ‘need’ in the Local Plan in place of demand when promoting the house building requirements in this area.
- I object to in the inflated and exaggerated housing “need” cited in the Local Plan of 13860 houses. The legitimacy and use of data which GBC cited was questioned – even by GBC itself. The miscalculated and misconstrued total was reviewed by the Scrutiny Committee of the council, who decided the housing number needed to be reduced. Despite this the number has now been increased.
- I object to GBC refusing to disclose their calculations in suggesting housing ‘need’ in order to allow appropriate scrutiny of the data.
- I object that GBC is proposing to go ahead with this inadequate and ‘not fit for purpose’ plan (so designated by Paul Beresford, local MP), particularly now the result of the referendum vote is in, bringing with it financial uncertainty and economic changes. Given this result GBC must acknowledge that their housing ‘need’ numbers are completely unsupportable and a re-evaluation is urgently needed. Not to do so would be the height of arrogance and foolishness. Particularly since a large proportion of the proposed ‘need’ for additional housing was based on an assumption of inward international migration. This is now so obviously unsupportable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
SHMA

I gather that the council has relied entirely on a consultants mathematical model for its projection of new houses needed. I’d like to see the basis for this model and the parameters and assumptions that informed the projection. I use statistics, data and models in my own work. Every model has its assumptions and weaknesses. The answers are rarely clear cut, with a range of possible outcomes. It’s a bit like predicting the weather … and we know how reliable that can be, don’t we? Small changes in the underlying assumptions can make a large difference to the outcome. What sensitivity testing was done to assess the effect of varying the assumptions? What are the P10, P50 and P90 projections?

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 local plan being based on extremely dubious housing needs figures coming out of the SHMA. The complete lack of transparency in how the figures are obtained is quick frankly disgraceful. How can Guildford Borough Council possibly stand by these figures when they have no idea what assumptions were made in their preparation?

I object to the local plan on the basis that the calculations for housing needs must now be obsolete as they would have been prepared on the assumption that the UK would remain in the European Union. The Brexit vote to leave the EU has directly resulted in substantial value being wiped off property development firms. This is strong evidence that the markets are expecting a major reduction in the need for future property development in the UK.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT TO NO CONFIRMATION FOR ALLEGED HOUSING NEED NOS.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1055  Respondent: 10721089 / Y Beraud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. I object to the proposed plan of G.B.C for Send. They have failed to provide sound evidence in the terms of employment land needs. Also the need for the housing numbers required of 13,860 homes. If the population is to grow by some 20,000 in the plan period we actually need 8,000 homes (This is based on an average of 2.5 persons per home). The Green Belt does not need to be built over, of the new homes required 50% or more could be built on Brownfield sites. The G.B.C transport assessment was not even available to the councillors for the vote taken on the 24th May being published on the 6th June. Infrastructure overload has not been taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1804  Respondent: 10721537 / Stephen Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated “housing need” figure of 13,860 which is far too high. This results in the unnecessary development of the Green Belt. The way the number of possible people coming to the area and being able to afford housing has been overestimated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4409  Respondent: 10722049 / Richard Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2792  Respondent: 10723553 / Judith Pound  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D). GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1660  Respondent: 10724769 / P. Broughton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. If students were housed properly by the university on site this would release approximately 2,000 homes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/636  Respondent: 10726561 / L. Boyle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 a number of proposals in the revised Guildford Borough Proposed Submission Local Plan. I ask that these objections which are listed below are considered by the Inspector.

My objections are listed below:
1. GBC have failed to provide good evidence in terms of Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2837  Respondent: 10727457 / Colin Eke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I OBJECT to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2573  Respondent: 10727489 / Gaynor Eke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to 2016 Local Plan

I OBJECT to the Guildford draft plan and its impact on the villages of Send and Ripley in particular plans A25, A35, A42, A43, A43a and A44

- I OBJECT to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/153  Respondent: 10729473 / P.T. Elms  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that GBC has failed to provide sound evidence in terms of ELNA 2015 which shows an 80% reduction in employment space from the previous ELNA carried out in 2013.
I object therefore to the use of Burnt Common as ‘industrial space’ as this is no longer required.

I object to the questionable nature of the housing numbers from the Strategic Housing Market Assessment.

I object to the wrong use of foreign student numbers to inflate the need for housing.

I object to what appears to be an exaggeration in the number of houses needed in the local plan (ie 13,860).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/154  Respondent: 10729473 / P.T. Elms  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that GBC have (dishonestly?) ignored the latest ELNA 2015 showing the reduction of 80% in required employment space from the previous draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/764  Respondent: 10731233 / Linda Aris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2637  Respondent: 10731329 / Sheila Hookins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3119  Respondent: 10731969 / Tony Mason  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1258  Respondent: 10733089 / Chris Barber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Similarly Local Development Plan(s) have been made based on the assumption of ever-more migration into this country and into Surrey but the Brexit vote will mean that some companies will now move to the EU so we do not now need to believe that the huge influx of “people for local jobs” will happen. Look at the empty Guildford High street shops and local offices to let if you need confirmation.

Theresa May says she will make a better Britain. She said this week: ‘Let us redouble our efforts. And let us make sure we put this time to good use, to build the support we need to go to the country in four years’ time, and not just win, but win big.

‘Now, more than ever, we need to work together, to deliver on Brexit, to build a country that works for everyone, and to truly unite our Party and our country.’

Changing the face of our Surrey villages does not concur with her new statement of intent. Think again and make a stand for a re-think from Mrs May and her government.

I also object on the basis that there is no publication detailing the development of sufficient facilities for schooling and medical support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3534  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
• The “objectively assessed need” figure of 693 homes a year is too high.

• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

• The current SHMA inflates the proposed housing figure due to

• failure to correct for errors in the historical data for international migration flows,

• issues with the way it considers students and affordability and

• flaws in the method for estimating the number of homes needed to support job growth.

• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/374  Respondent: 10741793 / Dianne Mathie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the over estimated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need and you really should take this into consideration for your figures to be true.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/94  Respondent: 10746209 / Pauline Fava  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- There is no proven evidence to show that we actually need the number of houses, industrial sites and further retail 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: PSLPA16/3160</th>
<th>Respondent: 10756033 / John Herbert</th>
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<td>I would ask the review participants and inspector to:</td>
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<td>1) Challenge the forecast population growth and housing numbers on which the plan is based namely:</td>
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<td>a. 13,860 new homes; an average 693/year for the next 20 years. This inevitably leads to extensive building on green belt; something, as I understand it, the NPPF seeks to restrict.</td>
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<td>We object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)</td>
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<td>The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.</td>
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<td>But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan</td>
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<td>6/ I object to the lack of clarity / support for the housing numbers included in the Plan</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: PSLPA16/185</th>
<th>Respondent: 10756961 / Carol Marsh</th>
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I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1253  Respondent: 10758593 / Richard & Delia Baker   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is illogical; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2062  Respondent: 10764385 / E.E Whearley   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6) I object to the proposals as there is hardly any evidence for so many houses and certainly none for industrial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2946  Respondent: 10765249 / Andy & Sonja Freebody   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3031  Respondent: 10769121 / Ali Elson  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very
special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3033  Respondent: 10769121 / Ali Elson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Land Availability Assessment (LAA) and Strategy on Sites

It is noted that the land availability assessment was undertaken with the task of reviewing sites which were proposed to be inset from the Green Belt. As a matter of record, there are a number of “discounted sites” which were not considered under the LAA, principally by reason of their not being identified in the Green Belt and Countryside Study. It is our view that the LAA can only be assessed as being correct and valid to the extent that the Green Belt and Countryside Study is itself correct, particularly in the context of this objection and representation by reference to the proposed inset boundary for the village of Effingham. We consider that the discounted sites in particular Lyons Field were discounted erroneously on the assumption that the inset boundary were fixed/agreed/correct which plainly they were not and are not until the plan is adopted.

Notwithstanding the above, and having regard to the land availability of sites within Effingham, these are limited to the following:

1. the Barn (site reference 1040 (page number 314-317 of the LAA)) (the "Barn") in respect of which land availability was assessed as being available to accommodate 16 homes (net) (17 gross);
2. Church Street (site reference 99 (page number 317-319 of the LAA). This site’s proposed allocation of houses is 22 net (22 gross);
3. Orchard Wells Beach Avenue (site reference 038 of the LAA) which is stated as being capable of providing five new homes net (6 gross).

This assumes a site plan allocation of sites comprising 43 units (net). We have commented on the extent of the inset boundary above, and stated why we consider that Lyon’s Field along with the remainder of the land shown edged pink on the attached plan, should be included within the inset village boundary of Effingham.

If this is the case, then we consider that Lyon’s Field is far more appropriate to bring forward in terms of land availability for housing. Feasibility of the development of this land has been undertaken and it is submitted that this can adequately provide housing of circa 18-24 units (2/3 bedroom). This assessment has been undertaken notwithstanding that part of the land falls within the zone of influence (within the 5k boundary of the SPA at Effingham Common) and development within such zone of influence would only be used to accommodate a maximum of nine units, in conformity with the SANG regulations proposed by the local plan.

Availability of the Barn

In terms of the LAA and its review of the three sites within Effingham above referred, we have the following comments in relation to the Barn.

It is evident that no feasibility study has ever been undertaken as to the suitability for development of the Barn for 16 units as proposed in the LAA. Furthermore, (notwithstanding the comments above referred regarding the sprawl of Effingham westwards, by reference to the proposed inset boundary proposed by the draft plan (to which this letter forms an objection)), it is submitted that the Barn site is not capable of providing 16 net units (even if our objections regarding the sprawl of the inset boundary westwards for which there is no justification, is not upheld).

The reason for this is that access to this site is extremely limited being a single track (currently used on a two-way basis with the six retail units fronting the Street), and which also serves as a footpath/bridleway. This access is not owned by the proprietors of the Barn and therefore cannot be improved and there is limited or no scope for widening. The local highway authority states that not more than five dwellings should be provided from a single point of access. Arguably, this is already provided by the means of access to the retail units and the Barn itself. To extend the use of the single track for an additional 16 units (net) (i.e. 17 units) is not feasible or capable of being achieved without another form of access being provided acceptable in highway terms, and which may necessitate the demolition of two or more additional dwellings in the Street to provide the same. This is not feasible on viability grounds.

Accordingly, it is submitted in our view that the provision of 16 units on this site is significantly optimistic and incapable of being provided. A more objective and realistic assessment of this site in terms of housing would be the provision of an additional four dwellings created by the refurbishment of the Barn building itself, although this will still have delivery issues on highway grounds.
In addition, we would also question the development of the Barn having regard to the historic nature of the Barn building itself. Whilst it is acknowledged that this is not a listed building and was relocated and reconstructed in its current position from an existing Sussex barn in Sussex in the late 1950’s, this building still has an historic interest and value to Effingham. Its walled garden is consistent with a village environment and a classic “English garden” which is synonymous with English villages.

Housing Need

It is evident from the local plan and the LAA that the Council considers that provision within the plan period (to 2033) of an additional 43 dwellings within Effingham is sufficient to meet Effingham’s housing need and to assist the wider borough’s housing supply requirement. This is to be construed with the recent planning permission granted for 6 x 1 bedroomed flats to be built on the A246 near Sibley’s newsagents (i.e. 49 in total).

The Emerging Neighbourhood Plan considers that Effingham’s housing need is in the region of 62 dwellings over the plan period following the undertaking of a local housing needs assessment. The proposal to “earmark” Brown’s Lane Field (parcel 1 on the attached plan) for future development post-plan period, is insensitive and not appropriate for the reasons above stated.

It is clear that there may be a challenge on Effingham to provide sufficient dwellings for its residents (in particular, younger residents) within the plan period on the proposals set out in the LAA for reasons above stated. We have severe concerns as to the correctness of this or indeed its ability to meet housing demand in the village. We totally endorse the neighbourhood plan’s proposals for selecting sites in the village envelope although we do not agree that the Barn will able provide the numbers of dwellings to which the LAA infers.

Realistically, and having regard to our comments in relation to the Barn and its capacity for development, the availability for housing in Effingham is as follows:

1. the Barn: 4 units (net);
2. Church Street: 22 units (net); and
3. Orchards Wells: 5 units (net).

Total: 31 units.

According to Effingham Parish Council’s assessment there is a need for 62 units (of which 6 units have already been satisfied (re Sibley’s)). Accordingly, there is likely to be a shortfall of required housing need in Effingham of circa 21 units in the plan period - excluding windfalls of which, in Effingham, the opportunities are limited.

It is for this reason we advocate that the land known as Lyon’s Field (shown coloured pink and hatched blue on the attached plan) should be included within the land availability assessment as being suitable for development. It is understood that this land is immediately available for development and feasibility assessments have been undertaken to detail its availability to accommodate anything from 18-24 units. In light of this, we respectfully request that you review the Land Availability Assessment, in particular terms of the feasibility of delivering the number of dwellings suggested for the Barn and also consider in light of the evidence from Effingham Parish Council as to its assessment of housing need within Effingham, that Lyon’s Field is included within the inset boundary and assessed as being suitable for development in terms of land availability to meet housing supply. Furthermore, for reasons above stated, we respectfully would suggest that Brown’s Field (parcel 1) is removed from the inset boundary (i.e. included within Green Belt) and not earmarked for future development post-plan period.

If the Council are not minded to include the land edged pink within the inset boundary then we would respectfully request that they consider including Lyon’s Field within the inset boundary on a safeguarded basis (in lieu of Brown’s Lane Field) as land marked for future development in a post-plan period. However, we strongly argue and object to its exclusion from the inset boundary for reasons above stated.

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: PSLPA16/43</th>
<th>Respondent: 10773025 / Graham Wright</th>
<th>Agent:</th>
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<tr>
<td>I object to the planned A3 junction changes at Burnt Common due to the effect on the surrounding villages.</td>
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<td>I object to all the additional houses when the local schools are already over whelmed with new applicants.</td>
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<td>I object to the amount of additional cars that will be on the road causing further risk to our children as they travel to and from school.</td>
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<td>I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.</td>
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2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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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: PSLPA16/4062  Respondent: 10773825 / Pierre Foskett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to evidence and process used for the local plan, an immediate independent review is required, not only have the numbers for the ENLA and SHMA been questioned but since the local plan has been proposed, the vote to leave the European union has significantly changed both economic and population forecasts, any calculations prior to this vote must now be re-assessed.

In summary, the proposals for Send in the local plan must be reassessed, the electorate are not happy and the local plan must be rejected. The plans for Send are not based on an objective view of the village. Send is nowhere near as urban as the issues documents describe and the evidence needs further appraisal. The proposed changes to the green belt and the proposed development sites would have a net loss to nature, local sustainability, the economy, health and well-being of the area. The presumption that Send is capable of sustaining this type of growth with a net gain is ludicrous. The vision for Send is not what the residents want. I would like to remind the council that it is elected to represent the residents of the area and that this lack due care and diligence to the village of Send is an insult.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2756  Respondent: 10774145 / P Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/194  
**Respondent:** 10774881 / Kate Cheyne  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

Please see documented below my objections to the final draft local plan (consultation period 6 June to 18 July). *Please ensure that my comments are referred to the Inspector.*

I object to the lack of evidence supporting future housing needs (which need further review in light of Brexit)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/195  
**Respondent:** 10774881 / Kate Cheyne  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Needs assessment:**

I questioned the scale of housing demand on which the revised draft local plan was based when first published. With the recent decision to leave the EU, and better control over immigration being a key argument in favour of this, I cannot see how the current demand forecasts are remotely reliable. I trust the study will need to be revised in light of the Brexit decision.

**Evidence base and Infrastructure:**

GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows c. 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. I simply cannot see why industrial space is needed at Burnt Common. With the proximity of the housing and industrial sites to the motorway, I expect that these will not serve the local community but rather be suited to those commuting in (to work) and out (if housed) of Send. This does not fit the objectives of providing housing for future requirements of the local community.

I want to point out that the GBC’s Transport Assessment was not available to Councillors for the vote taken on 24 May 2016, being published on 6 June. The plan does not have enough consideration for infrastructure overload. The road network in the Send area, particularly Send Marsh Road and the A247 linking Portsmouth Road and the A3 to Woking...
cannot handle any more that it already does. It is impossible at the moment particularly during peak times. The proposal of a 4 way interchange onto the A3 would mean that the roads through Send Marsh and Send would become the main link between the A3 and Woking, completely changing the village into a thoroughfare.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1336  Respondent: 10775137 / Wendy Lodge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to Guildford Borough Council not taking evidence into account when producing the current plan.

The Employment Lands Needs Assessment 2015 (ELNA) shows an 80% reduction in employment space from the previous ELNA of 2013. This surely indicates that there is no need for any further industrial space in Send Village. I object to plans for further unneeded industrial development in Send Village.

I have concerns over the assessment of housing need in Guildford. If the population of Guildford is to grow by 20,000 in the planned period this would require 800 new homes, based on the average 2.5 persons per home. How can you justify a need for 13,500 homes while using foreign students to inflate the figure in The Strategic Housing Market Assessment 2015?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1703  Respondent: 10775169 / Caroline Grafton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

Transport evidence is not yet fit for use and major transport issues are unresolved e.g. another river crossing, a central bus facility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/661  Respondent: 10776033 / Prue Robinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2470  Respondent: 10780929 / Naren Nanda  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/503  Respondent: 10782625 / Heather Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3647  Respondent: 10782689 / Murray Dudgeon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very
special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1778  Respondent: 10784769 / Jane Baker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3859  Respondent: 10784769 / Jane Baker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2147  Respondent: 10785633 / Penelope Eagle  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
The current SHMA inflates the proposed housing figure due to
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1052  Respondent: 10793281 / Paul Woodington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3591  Respondent: 10796417 / Richard Shenton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.
2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3593    Respondent: 10796417 / Richard Shenton    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1704  Respondent: 10798369 / Gail Hollis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposed development of Gosden Hill, Blackwell Farm and Wisley Airfield. The requirement for this number of houses has not been disclosed and is therefore in my mind grossly exaggerated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1709  Respondent: 10798369 / Gail Hollis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/3274  Respondent: 10800065 / David Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have 4 key reasons for objecting to these plans:

I OBJECT TO THE LACK OF SOUND EVIDENCE BEHIND THE LOCAL PLAN

• I OBJECT to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly dubious. These include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area. This is even before the EU referendum result, which will inevitably impact on demand for housing in the area.

• I OBJECT to the lack of transparency in justifying the requirement for both new homes and the industrial developments. There has been no public scrutiny of the SHMA and even local councillors and Parish Councillors have not been able to review the numbers. In fact, the SHMA model has been calculated by a contractor on behalf of GBC and that the resultant commercial sensitivity of this data prohibits wider review. This lack of transparency builds mistrust in the basis for the GBC numbers and suggests that they may be based on unrealistic data.

• I OBJECT to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000. This suggests that GBC are intending that the Borough will be building homes to meet the need of other areas, such as Woking. Rather than destroying the Greenbelt, other brownfield sites should be sought in urban areas, even if they are outside the Borough. If not, Send and Ripley will become a conurbation of Woking and Guildford.

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:

Comment ID: PSLPA16/4030  Respondent: 10800673 / Nigel Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 SOUND EVIDENCE BEHIND THE LOCAL PLAN

• I OBJECT to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly dubious. These include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area. This is even before the EU referendum result, which will inevitably impact on demand for housing in the area.

• I OBJECT to the lack of transparency in justifying the requirement for both new homes and the industrial developments. There has been no public scrutiny of the SHMA and even local councillors and Parish Councillors have not been able to review the numbers. In fact, the SHMA model has been calculated by a contractor on behalf of GBC and that the resultant commercial sensitivity of this data prohibits wider review. This lack of transparency builds mistrust in the basis for the GBC numbers and suggests that they may be based on unrealistic data.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1767  Respondent: 10803297 / John Collomosse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 evidence base for the level of overall housing identified in the Plan

I object to the use of poor data in predicting the actual numbers of houses needed in the Plan. This is based upon 693 houses per year needed primarily due to predicted increases in student numbers e.g. at the University. Let me tell you now as a professor at the University we will not be seeing anything like that growth especially considering the impact on EU recruitment via Brexit. The whole evidence base via the Strategic Housing Market Assessment seems ill informed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/187  Respondent: 10804993 / Alex Laing  Agent:
I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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Comment ID: PSLPA16/1433  Respondent: 10806945 / Chris Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) I object to the Strategic Housing Market SHMA figure of 693 houses per annum as GBC refuses to publish the report and verify the figures.

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?

Attended documents:

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Comment ID: PSLPA16/2658  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
  - It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially
confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas {Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2802  **Respondent:** 10816481 / Jeff Waine  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object wholly to the number of houses proposed for Wisley, Gosden Hill & Blackwell Farm over 5,000. GBC housing requirements are overly exaggerated and not open to inspection.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1645  **Respondent:** 10816673 / G Hall  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. 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.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1653  **Respondent:** 10816673 / G Hall  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I understand the SHMA Figures for Guildford B C are to be revised

Following BREXIT

and

Following errors made

I therefore object to the draft Local Plan as the Housing figures are incorrect

If you correct the figures my understanding is that at least 100 dwellings per annum for 20 years would be removed from the figures for Guildford Borough

So that is well in excess of 2000 homes and once that is the case, G B C really does not and should not develop green belt sites

I request that the figures be re visited

I request that G B C do focus now on derelict land, ghastly brown field sites and develop those and leave countryside alone

There is no need to touch 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: PSLPA16/2944  Respondent: 10816993 / Jane Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base.
and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2931  Respondent: 10819009 / Sheila Griffin  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the high number of new houses which are proposed in the New Local Plan. I have seen no substantial evidence to support this need. It is unacceptable that the calculations on which the numbers are based have not been subject to scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/81  Respondent: 10819297 / Phil Haymes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• The housing demand assumptions are flawed given possible indigenous population growth and future migration within and beyond Europe and therefore do not require a massive in increase housing density in this area.

• The planning process seems overly complicated such that many hard working people will I imagine not have the time to fully engage with it.

It really troubles that at the proposed rate of development in the South East there will be little/no green built land left between Horsley and Surbiton by 2050 and it will be one continuous urban sprawl. The local authorities should take a much more cautious and prudent rate of development mindful that the demographic forecasts are probably wrong. Given the scope and scale of this ‘new plan’ which seems remarkably similar to what was previously proposed it seems to me my Local Authority are determined to rail road this through come what may!

I remain seriously concerned about this process and the scope and scale of the plan for the East Horsley area. I would therefore urge the Planning Department once again to re-consider this ‘new plan’ and propose something more appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3091  Respondent: 10820417 / Trevor Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers appx d

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3098  Respondent: 10820481 / Lisa Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/694  Respondent: 10820961 / D Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Council has failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 which show an 80per cent reduction in employment space from the previous ELNA carried out by the Guildford Borough Council in 2013. This means the industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The required 1368 houses in the local plan is exaggerated if the population is to grow by some 20,000 in the plan we actually need 80,000 houses (based on average of 2.5 persons per household.) The Green Belt does not need to be built over. The Guildford Borough Council's transport Assessment was not available to councillors before the vote was taken on May 24th being published on 6th June. Infrastructure overload has received scant attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3418  Respondent: 10822913 / Karen Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3304  Respondent: 10824193 / Rupert Phillips  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Surrey University and Guildford BC have identified the area as being suitable for development to meet the growing population demands. The formulae used to calculate the potential growth of those wishing to purchase their homes I believe is flawed as undertaken by a commercial company with vested interest in future development. Following Brexit there should be a reassessment which I suspect will reduce annual target.

With the planned expansion of Guildford there are I recall no new car parks planned, the vast majority of shoppers would drive to town if purchasing goods or for heavy food shopping, bus and cycle ways of no benefit in those instances and bus travel not practical. The river idea would be a leisure facility and not for main shopping.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1029  Respondent: 10824385 / Ian Macfarlane  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2917  Respondent: 10826209 / David Rider  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the grossly overstated future housing need that underpins the Guildford Borough Plan. I accept new housing is required, but I question the assumptions that have been used. I believe if a more realistic assumption was used, it would be possible to accommodate new housing within existing urban brownfield areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/945  Respondent: 10829409 / Anne Fulton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2166  Respondent: 10829409 / Anne Fulton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/66  Respondent: 10831201 / Norma Plank  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6) I object to the lack of any evidence for the alleged need of the housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I OBJECT concerning the major doubt over the inflated number of proposed new houses using a mathematical model which is not revealed in the New Plan. It will result in a population increase which is almost 70% higher than the official national estimates for population growth in the Borough.</td>
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<td>I do hope that you will reconsider the New Local Plan in the light of these comments. My real fear is that once the character of the Horsleys has been destroyed, there will be no going back.</td>
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<td>I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation.</td>
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<td>My comments are set out in this letter. I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not accept the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period. I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I fully and un-equivocally support this policy. The Green Belt is a national asset which should be treasured; the whole character of Surrey will change over time if GBC allow the degradation of the Green Belt. If every time there is pressure to build housing, GBC uses the Green Belt as an area for negotiation, the unique character of Surrey will be lost forever and the generations that follow will look at this moment as a trigger point in the decline of Surrey.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe Local Plan Response 13.06.16 the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3931  Respondent: 10833025 / M Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Furthermore housing numbers from the 2015 (SHMA) are highly questionable.

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3921  Respondent: 10833089 / J Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Furthermore housing numbers from the 2015 (SHMA) are highly questionable.

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1092  Respondent: 10833537 / AC Vause  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The "objectively assessed need" figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects. The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth. It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is Ibelieve inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1447   Respondent: 10836033 / Katherine Gervasio   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough because it is too high

The Plan’s proposed growth is based on the SHMA report which says that 693 homes a year are required by the borough. This is more than double the figure of 322 used in previous plans. However, the Council will not publish the SHMA report so how do we know if this figure is commensurate with demand or not? This lack of transparency is unacceptable for consultation on the Plan!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4025   Respondent: 10836033 / Katherine Gervasio   Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough because it is too high (Appendix D).

The Plan’s proposed growth is based on the SHMA report which says that 693 homes a year are required by the borough. This is more than double the figure of 322 used in previous plans. However, the Council will not publish the SHMA report so how do we know if this figure is commensurate with demand or not? This lack of transparency is unacceptable for consultation on 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: PSLPA16/1736  Respondent: 10837313 / Mary Jane Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 clarity given with respect to the derivation of the housing requirement figures that appear to have been based on an exaggerated housing need which has resulted in increased numbers that can only be satisfied by building on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/181  Respondent: 10838529 / Tracey Watson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to submit the following comments and concerns regarding the latest version of the local plan.

- I believe the annual number of houses being proposed each year is too high and needs reducing as the current number does not stand up to detailed scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/62  Respondent: 10839009 / Jacky Fenton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

You have failed to provide sound evidence for your “late additions” in terms of the Employment Lands Needs Assessment of 2015 (ELNA), which shows an 80% reduction in employment space from previous Assessment carried out by Guildford Borough Council in 2013. This means that industrial space at Burnt Common is no longer needed.
I strongly **OBJECT** to the industrial development at Garlick’s Arch. This is just not needed since the (ELNA) has shown a reduction of 80% in required floor space from the previous plan. If there is a need for industrial space, then this should be a Slyfield.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/63</th>
<th>Respondent: 10839009 / Jacky Fenton</th>
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I strongly **OBJECT** to the housing suggestion at Garlick’s Arch, as there is no more need for these houses. The number of foreign students I feel has been wrongly used to inflate the need. The required 13,860 houses in the local plan is vastly exaggerated. If the population is to grow by 20,000 as suggested in the plan period, we actually need 8,000 homes, (based on an average of 2.5 people per home).

**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: PSLPA16/1042</th>
<th>Respondent: 10840769 / Rosemarie Haxton</th>
<th>Agent:</th>
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3) I **OBJECT** to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/3404</th>
<th>Respondent: 10843233 / David Hardiman</th>
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I understand that the inflated number of new houses proposed seems to arise from a Startegic Housing Market Assessment (SHMA) that was generated by a consultant's model which is not revealed in the plan. Nor apparently to GBC. This SHMA target housing number seems to have been further increased by GBC to give population increase which is almost 70% higher than the official estates for population growth in the Borough. The scale of this increase has alarming results e.g. I am led to believe up to 35% in existing West Horsley households which would seem incredible! If this is indeed how the calculationss were formed it is alarming, and a demonstration of a lack of understanding of the local environment, population and infrastructure.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/74  **Respondent:** 10843489 / Philip Fleming  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have just reviewed the revised Local plan that was published on 6 June, and I find it completely unacceptable for the following reasons:

1. I do not believe that the population increase has been correctly estimated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4537  **Respondent:** 10843905 / G King  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Evidence Base and documents:

The whole basis for the plan is justified on the results from an external consultancy. The information from the Strategic Market Housing Assessment [SHMA] belongs to Guildford Borough Council but no explanation has been given as to the calculation of figures or the model used. The assessment and calculation process has not been transparent. These figures, however they were calculated, must be revisited following the results of the recent EU referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2447  **Respondent:** 10844609 / Sam Critchlow  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/2967  Respondent: 10844993 / Simon Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3905  Respondent: 10845537 / Chloe Moore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

lack of evidence for housing numbers needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2611  Respondent: 10845569 / Stu Edwards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to

lack of evidence for housing numbers needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3482  Respondent: 10846625 / Frank Drennan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 dearth of the evidence base. The submission documents are unsound, unreliable and inconsistent.

1.2  I object to the way in which the current SHMA inflates the proposed housing figure, some examples of which are summarised below:
the failure to correct for errors in the historical data for international migration flows.

the failure to update the demand estimate in the light of the EU referendum vote. The ONS data supporting the SHMA makes it absolutely clear that the primary component of future housing demand is net international migration. The assumptions underpinning the calculations must be revisited following the decision for the UK to leave the EU.

the way it considers students and affordability, and

the flaws in the method for estimating the number of homes needed to support job growth.

the treatment of vacant property

1.3 I object to the way in which the Green Belt and Countryside Study fails to value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

1.4 I object to GBC’s failure to evidence and articulate the exceptional circumstances required to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

1.5 I object to the use of Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp173/570</th>
<th>Respondent: 10847521 / Andrew Procter</th>
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1.1 I object to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

1.2 Key parts of the evidence base are flawed or based on withheld assumptions.

1.3 The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

1.4 An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

1.5 Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

1.6 The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an
additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

1.7 38,357sqm of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

1.8 The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

1.9 “There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

1.10 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

1.11 The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/260  Respondent: 10848705 / John Woodcock  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the lack of evidence for the alleged housing need numbers. In previous versions of the draft it was explicitly stated that a significant factor in the demand for housing was the national requirement to make provision for migrants. Given the recent EU referendum result, it is almost certain that the migrant numbers anticipated will be very significantly lower than at present and thus it is rash to go ahead with a Local Plan based on housing need numbers that will drop.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/143  Respondent: 10849377 / Vickie Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Forecast Population and Housing Increases: The forecasts in the ‘Evidence Base’ needs to be updated given the recent decision to ‘Vote Leave’ from the EU, especially given controls on immigration rather than freedom of population movement into the UK. In addition the ‘Evidence Base’ needs to consider the final decision on an additional runway at Heathrow or Gatwick or not at all. The Strategic Housing Market Assessment (SHMA) should be re-assessed based on these two issues and in addition be based on credible data inputs and model and not result in 70% higher than official national estimates for population growth in the Guildford borough.

This alarming incorrect data currently results in planning for more than 593 homes in East and West Horsley and a 35% increase in West Horsley housing alone which is not appropriate. Proportionate is included in the definition of Large Villages which leads me to conclude that the substantial development being planned for East and West Horsley are in fact likely to be very disproportionate to their current sizes. Whilst I believe that some new homes should be built in East and West Horsley, the types of these homes should be specifically controlled to provide homes for younger families and for older downsizing residents. The village does not need any more large and expensive 4 or 5+ bedroomed detached houses that will only mean massive profits for developers and will continue to distort the demographic balance of the village. The focus for East Horsley local house building should first priority be with the existing ‘Brownfield’ locations only.

The potential housing requirements therefore need to be corrected for a credible population estimate before any non-Brownfield locations could possibly be considered for development. If the total housing needs reflect lower population estimates, the Brownfield sites could account for the vast majority of the housing required. If the population projections are proved incorrect over an initial 5 year period, certain other sites would then not have to be considered for development. If the current projections prove to be too high, GBC will avoid unnecessarily building on previously undeveloped areas and irreversibly damaging the Surrey countryside. Student housing should be focused on the University site, and not be exaggerated for in local villages like East Horsley where transport links are already inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I do not believe the plan has considered properly road infrastructures and as a resident of Ripley have major fears and so I object
1. I also do not believe the plan considers the provision of enough Schools and Doctors and so again I object.

Finally I would ask the borough to re think the plans based on the community responses properly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/32  
**Respondent:** 10853857 / Norman Kidd  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. EVIDENCE. GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. 50 of new homes needed could be built on brownfield sites! GBC's Transport Assessment was not even available to councillors for the vote taken on 24 May, being published on 6 June. Infrastructure overload has received scant attention. GBC Officials seem to be blind to the concept of using brownfield sites but just take the easy of option of removing Green Belt in areas that do not generally affect them directly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1695  
**Respondent:** 10854113 / Sarah Pickering  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WE OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe
inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **EVIDENCE.** GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. **50 of new homes needed could be built on brownfield sites!**

GBC's Transport Assessment was not even available to councillors for the vote taken on 24 May, being published on 6 June. Infrastructure overload has received scant attention. GBC Officials seem to be blind to the concept of using brownfield sites but just take the easy option of removing Green Belt in areas that do not generally affect them directly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPA16/3511  **Respondent:** 10857249 / Alice Pashley  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.
5. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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:** PSLPA16/4526  **Respondent:** 10858977 / Angela Otterson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?**

( ), is **Sound?** ( ), is **Legally Compliant?** ( )

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**EVIDENCE BASE**

I object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent.

Key parts of the evidence base are flawed or based on withheld assumptions.

The current SHMA inflates the proposed housing figure due to the following factors:

- the failure to correct for errors in the historical data for international migration flows,
- the way it considers students and affordability, and
- the flaws in the method for estimating the number of homes needed to support job growth
- the treatment of vacant property

The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses.

The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.

Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.

No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.

Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach.
The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladaymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patters in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

I believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1041  Respondent: 10859265 / Neil Haxton  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()  

3) I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:

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Comment ID: PSLPA16/1426  Respondent: 10859489 / Jennifer Procter  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()  

SHMA
I object to the huge housing number need put forward by GBC. The definitive SHMA that has been produced for Guildford Borough Council by G L Hearn and sets a requirement of 13,600 homes for the Borough is questionable. GBC has been less than transparent in informing the public how this figure is arrived at and admits that they themselves have
not scrutinised the calculations. This has been critically examined by further expert investigation. It is inflated by the inclusion of dubiously arrived at numbers based on student numbers, immigration and a heavily weighted growth agenda.

I object that GBC is not applying any constraints to the housing number. Neighbouring Boroughs are doing so. Guildford Borough is almost wholly Greenbelt with large areas of outstanding natural beauty, good quality farmland, sites of special scientific interest and SPA's. It has many acres of river and canal frontage as well as ancient woodlands. It is rich in wildlife and home to rare species. Many sites are also prone to regular flooding. All this in itself should invite definitive constraints.

Furthermore the narrow country lanes and village infrastructure cannot and will not cope with the level of development proposed. It is unsatisfactory and, in fact, dangerous to hand 'constraints' over to developers. These same would be developers are already, in the case of Wisley, advertising the new homes at Wisley in local cinemas. This level of disregard for reality bodes very badly for the future of our borough.

**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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FINALLY

I believe this plan is ill conceived, uses misleading data and contains many fundamentally flawed assumptions and errors. I do not believe it can be achieved and as a template for the Borough going forward it gives a depressing glimpse of a chaotic future where a great deal will be lost for short term gain in the hands of the few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3791  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Highway Assessment

I OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have
An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.
There is little information about the tunnel but the map indicates that one access/egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3792  Respondent: 10859553 / MARK Curtis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Strategic Housing Market Assessment (SHMA)

I Object

The “objectively assessed need” figure of **693 homes a year is too high**.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to **510 homes a year** and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

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The Land Assessment

I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

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Green Belt & Countryside Study

I object

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for
London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1678  Respondent: 10860993 / Peter and Fiona Armitage  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In general terms I have grave concerns over the sheer scale of the proposed building development which is substantially in excess of all accepted population growth estimates for the Borough. Why so many when you have failed to demonstrate that they are required on this scale? I object to the plan on these grounds alone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/564  Respondent: 10865537 / Edwina Fassom  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/430  Respondent: 10866305 / Christine Reeves  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

10) I Object to the lack of any immediate evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2627  Respondent: 10866721 / Andy Court  Agent:
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

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 lack of evidence that these high numbers of houses are actually needed.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With the country about to negotiate Brexit now is not the time to start making massive changes, until we know what direction we will be moving in and how our economy will be effected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3573</th>
<th>Respondent: 10868513 / Tom Stevenson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>The West Surrey Strategic Housing Market Assessment is shot through with holes. In particular it is guilty of double counting. Starting with an annual target of 517 new homes each year based on official government growth figures, you have then added more homes to account for economic growth and for affordable housing, which are already included in the government figures. This is outrageous.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<th>Comment ID: PSLPA16/343</th>
<th>Respondent: 10868609 / Robert Lockie</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>1. I object to the lack of any evidence for the alleged housing need numbers.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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</tbody>
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<th>Comment ID: PSLPA16/2790</th>
<th>Respondent: 10868609 / Robert Lockie</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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<td>I object to there being no transport document at the time councillors voting to put the proposed local plan out for consultation, nor at the time when the local plan was put out for consultation, not at the time of the meeting in Send (attended by GBC councillors) after the plan has been put out for consultation. Traffic surveys were said at this meeting to be taking place ‘soon’. I object to this being done at this time of year when traffic decreases as there is (1) less school traffic as GCSE and A level pupils are not attending school regularly (2) private school break up at the beginning/middle of July (3)local authority school will have broken up by 21st July (4) we are in a general holiday period when many</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</tbody>
</table>
people are away on holiday regardless of the schools. A traffic survey at this time will not be a true reflection of the general traffic situation. Most of the time it is a nightmare getting through traffic, especially in the rush hours, which can be extensive as people start to travel to work (M25 & A3) at least from 6am and in the evening until at least 7pm. Adding to this is the total standstill on our roads, often for long periods of time when there are accidents on the M25/A3 - these hold ups are most days of the week. A survey done in the summer months will only record what GBC to show – that traffic is not a problem at the moment. A traffic survey needs to be done in October or later over several days when things are really bad.

I object to mention of a tunnel going under Guildford being put forward at this meeting as it is more or less a forgone conclusion that it will happen. A tunnel would need excessive funding that would have to come from Highways England. It is no good GBC saying they are going to consult with them: this should have been done BEFORE the proposed local plan was voted on and put forward for consultation. Even if this was agreed, it would take years to build and would cause massive disruption in the area. The Hindhead Tunnel cannot be used as an example as this was first proposed years and years ago and Hindhead was a bottleneck as there was only a single lane carriageway each way – The A3 already has a 3 lane carriageway.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4180  Respondent: 10869441 / Chris & Louise Dorman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am emailing to object to the proposed local plan which is open for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 until today.

In the Sustainability Appraisal of the local plan (June 2016) at paragraph 3.1.3 it states that ‘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 the South East England.’ The Corporate Plan goes on to explain that:

'We want Guildford to be a centre for education, healthcare ....... a county town set in a vibrant rural environment which balances the needs of urban and rural communities alike .........and with infrastructure that will properly cope with our needs.”

I would argue that the rural borough will no longer be rural if the proposed development of housing goes ahead and that the need of those already living in the borough's rural villages won't be balanced because of the erosion of the green belt and the increase in concrete, pollution, congestion on the roads, pressure on our already full schools and GP surgeries, sewage and water supplies. The impact on heritage sites in and around the Horsleys and the impact on our environment which is beautiful and rural will inevitably be negative. The precise details on infrastructure which will 'properly cope with our needs' appear vague amongst the reams of documentation and any infrastructure needs to be funded. How exactly (taking away whatever possible developers have to contribute) will this be funded and indeed actually met?

The plan has to be considered for legal compliance, soundness and duty to co-operate.

The plan is obviously detailed and refers to evidence. The problem with population projection etc as evidence is that it is not hard evidence but just possibles. A major national referendum regarding leaving the EU has taken place SINCE this plan was published and open for consultation and surely evidence must be sought regarding the need for housing, planning, migration, population movement and growth in light of this major decision? The NPPF requires the development plan to be based on up to date evidence.
With regard to soundness, the plan has to be positively prepared, justified and effective. There is a presumption in favour of sustainable development. I don't believe that the proposals are fully sustainable and not convinced that they are justified. The SA report (referred to above) refers to concerns from Elmbridge regarding the proposed Wisley site. We query whether this is the right location for this scale of growth. The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London. This site is located in the very north (east) of the borough where the Green Belt is already fragmented and particularly vulnerable to additional development, a point noted by the Inspector for the examination into our Core Strategy. Further evidence should be provided to indicate why this site has been identified in preference to other sites having regard to the strategic significance of the Green Belt in this location.' (page 23/145) of the SA report.

The proposed site at Wisley for 2,000 homes is already flagged up with issues such as pollution and climate change, already heavy congestion on the A3, biodiversity etc. The SA report also refers to a 'strong commitment to deliver a new GP surgery as part of the scheme...' And then much more vaguely and worryingly refers to residents who 'would also be with c.3-3.5km of a surgery at East Horsley (understood to have capacity to expand)'

Is a strong commitment enough or does it just mean that it may happen and that more pressure will be actually placed on the East Horsley surgery? Where is the evidence to support the statement that the East Horsley GP surgery has capacity to expand? It would only serve to put more pressure on an infrastructure that doesn't need any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2791  Respondent: 10872545 / David and Rachel Price  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed amount of new housing actually needed in the area has apparently been inflated by using the Strategic Housing Market Assessment (SHMA). This number which is only based on a consultant’s mathematical model and not revealed to the local plan, is then increased even further by Guildford Borough Council to give a highly inflated suggested population increase. This is potentially 70% higher than official estimates for the growth of population within the Borough. The scale would mean an increase in a huge 35% of existing West Horsley households. This is higher than any other single area in the Borough. It is very worrying that the Council are relying on such data without really knowing what the real figure would be. This is very alarming and worrying. We need clarification on this. Much needed housing affordable housing in some areas is much needed and inevitable but to inflate the housing number using dodgy data just should not be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1770  Respondent: 10873377 / Rebecca Howard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

What is more unsettling is the revelation that the Council is unwilling to release the evidence base it has used to justify the need for 14,000 new houses in the Borough. Surely if the Council was confident in the accuracy of its proposed housing figure it would have the courage and conviction to release the information. Not to do so simply fuels an
understandable suspicion that the 14,000 figure cannot be justified. Furthermore, I understand that the reason given by the Council for not releasing this information is that it is the “intellectual property of a third party and is commercially sensitive”. This is ridiculous. Are we really expected to believe that this third party, GL Hearn I believe, whom the Council has engaged owns the evidence and whatever models have been produced to derive the 14,000 figure? If this is true then whichever Council employee agreed to this has made a monumental procurement “cock-up”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3890  Respondent: 10874241 / James Grzinic  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 the SHMA target housing number being used to justify the disproportionate increase in housing stock in our villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4225  Respondent: 10876897 / Norman and Morag Evans  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) Before going into detail, I would like to preface my comments with some general observations about the whole process. It is widely recognised that the country’s economy is out of balance and that too much business activity and supporting population is concentrated in London and the South East. It seems perverse, then, to exacerbate the problem by creating excessive development in the South East, putting further pressure on the region.

2. There are other factors and constraints that need to be considered, especially the impact of Brexit on population figures and infrastructure funding, and the possibility of a third Heathrow runway, which would result in an enormous increase in traffic in the area. In addition, the Royal Horticultural Society is planning a major re-development of its headquarters at Wisley which will result in more visitors and traffic, putting further pressure on the A3 and nearby intersections. An increase of 25-30,000+ in the local population would cause intolerable strain on the Royal Surrey County Hospital, itself already under pressure.

3. The borough of Guildford is not an ‘island’. Development within the borough has impacts on surrounding boroughs and areas in terms of traffic, housing demand, infrastructure and so on. The reverse also applies. The piecemeal approach of the Local Plan process means there is no strategic planning, covering a much wider area, including London.

Taking just one example, the A3 serves a number of boroughs throughout its length and any development planned along its route by other boroughs will have a major impact on Guildford borough. To this extent, the entire process is flawed.

2) Housing Assessment - I OBJECT
The Housing Minister Brandon Lewis has been quoted as saying: ‘Picking housing numbers out of thin air and imposing them on local communities builds nothing but resentment’. It is a pity GBC failed to hear him.

The Local Plan is formulated on an SHMA which has been based on a methodology unknown and unscrutinised, even by the Council. It is complete folly, therefore, to produce a ‘plan’ on such a basis. Moreover, it has been produced by an outside company which is part of a major property and development business, thereby negating its objectivity.

The figure of 693 homes per year is substantially higher than the 2014 assessment and more than double that of the 2003 plan. Further doubt about the accuracy of the figure arises because of the Council’s previous actions in relation to the South East Plan. GBC made a successful legal challenge against the then Government’s proposal for 422 homes per year but now vigorously promotes 693 homes per year. At the time of the legal challenge victory, a senior Councillor said: ‘Our successful challenge means that local concerns have now been heard and taken into account when planning the future of our borough. … It is reassuring that the South East Plan housing targets which many felt would have prejudiced the character of the borough no longer apply.’ Why is the Council not hearing the local concerns now and why is it not fearful of a massive change in the character of the borough with such a high SHMA?

Furthermore, the SHMA is increased by GBC to give a population increase almost 70% higher than official ONS estimates for population growth in the borough. This, for example, results in an increase of 35% in existing West Horsley households. At present, there are 2,808 homes in both East and West Horsley: if the Plan is accepted as it is, there will be AN EXTRA 5,000 homes within five miles, including 600 in the Horsleys. Overall, the Plan proposes more than 8,000 new homes in the Green Belt but only about 1,100 in the Guildford urban area.

It is generally recognised that there is a chronic shortage of social housing and of one or two bedroomed properties for sale or rent in the borough. Moreover, there is a need for homes, particularly bungalows, for elderly people wanting to downsize and stay in the area. There appears to be nothing in the Plan to address these issues, except the aspiration for 40% affordable homes in the larger developments. With the current level of house prices in the borough, it is doubtful that many would-be buyers would be able to afford an ‘affordable’ property or an ‘affordable’ rent. Also, developers are renowned for using their ‘get-out card’ to avoid building ‘affordable’ homes. There appears to be a serious mismatch between the housing need and where and how it could be met. Rather, the Plan simply gives a green light to developers to build all over the Green Belt and to plan for future ‘easy’ growth.

The unjustified and inflated housing figure will cause unacceptable pressure on local infrastructure and result in a complete change in the character of the borough. The Council appears to be ‘going for growth’ for growth’s sake, ignoring its own past views as well as those of current residents. Overall, its Plan would ‘urbanise’ the borough, extending the sprawl of London and its suburbs to Guildford and beyond. To minimise the need for huge infrastructure developments, most housing growth should be accommodated within Guildford itself, leaving the borough’s villages to grow organically.

In its desire for ‘forced growth’, GBC has utterly failed to consider the constraints to development and the SHMA figure, such as the Green Belt and need for infrastructure, which if employed would result in a much more realistic and sustainable scale of development and one in keeping with the borough’s character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not agree with Strategic Housing Market Assessment. The mathematical model does not seem sound as it gives a population increase which is nearly 70% higher than the official national estimate for population growth in the Borough. The mathematical model used should be made public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3241  Respondent: 10877249 / Ann Hamilton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The failure of GBC to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 hoses in the Local Plan is exaggerated. If the population is to grow by some 20,000 in the Plan period, 8,000 homes would be needed based on an average of 2.5 persons per home. The Green Belt does not need to be built over and half of new homes could be built on brownfield sites. It appears that GBC’s Transport Assessment was not even available to councillors for the vote taken on 24th May and this was only published on 6th June with infrastructure overload receiving scant attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1608  Respondent: 10878433 / John Townsend  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1079  Respondent: 10878465 / George Kalorkoti  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing in relation to the Proposed Submission Local Plan that Guildford Borough Council (GBC) has now published for public consultation:
1. **I OBJECT** to what is excess growth in housing stock compared with anticipated population in The plan shows housing stock growth of 25% compared with projected population increase of 15%. In addition, I question whether the anticipated population increase is overstated in view of Brexit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1081  Respondent: 10878465 / George Kalorkoti  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. There is an **ERROR** in the Land Availability Assessment (LAA) dated February 2016 in terms of access to Fangate Mano As set out in my letter dated 8 July, which I submitted in my capacity as Chairman of Manor Close East Horsley Residents Association, there is a plan on page 299 of the LAA that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will not be granted. MCRA will oppose any change to the character of this very quiet road. The road and the verges are narrow and are not suited to any growth in traffic. I therefore ask that GBC corrects this **ERROR**.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2649  Respondent: 10878977 / Lisbet Hjort Jensen  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **I OBJECT** to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

0 The "objectively assessed need" figure of 693 homes a year is too high. A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth. It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and
significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/735</th>
<th>Respondent: 10880257 / Carolyn Whitfield</th>
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1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no provision for Garlicks arch so the Plan takes no account of the infrastructure needed for this site. It is therefore not fit for purpose.

Please take these objections into consideration and the Plan is amended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10880609 / S. Groves</th>
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I OBJECT to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to there being no evidence what so ever as to the alleged need for housing at the stated figure. It is excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
16. I object to the number of 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Guildford Borough Council not disclosing how the number of 13860 houses required in the Borough was calculated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the inflated “housing need” figure of 13,860 which would result in the unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4550  Respondent: 10889985 / Ruth Macdonald  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough as being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough. It is over double the previous figure of 322 used in previous plans. The SHMA report methodology is, I believe, inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3309  Respondent: 10890177 / Cheryl Burnside  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
APPENDIX D

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to:
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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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I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D).

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For the West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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When this issue was raised by others, they were, according to Council Meeting Minutes advised that ...such opportunity was long gone...and such questions were out of time. Such tactics are questionable and not transparent.
Additionally, I object to the use of out of date forecasts of housing requirements.

This inability to provide the public with credible data gives rise to a very strong probability of a successful challenge to the Local Plan as it seems to fail even the most basic "test of transparency" required at law. This failure gives rise to the risk of Appeal involving high court cost which will likely wipe out GBC Legal Dept budget to the detriment of ratepayers.

I further OBJECT to GBC taking incalculable risks entering into long term commitments and complex contractual financial undertakings with Developers & Builders who are already suffering reduced demand and associated financial uncertainty of demand/ price slump potential with the economic impact of the United Kingdom on leaving the European Union not likely to be fully known for up to 5/10 years.

There is also no evidence to show that new Industrial Units are needed, there are already several empty ones in the area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3243  Respondent: 10895009 / Holly Broughton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. If students were housed properly by the university on site this would release approximately 2,000 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1657  Respondent: 10895137 / Katrina Broughton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. If students were housed properly by the university on site this would release approximately 2,000 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1808  Respondent: 10896801 / Clare Fluker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have given the proposed Local Plan a great deal of consideration and I strongly object to the Local Plan as presently drafted on the following grounds:

The proposed housing numbers have no basis in the real world and seem to have just been plucked at random out of thin air. This completely undermines the basis of the whole Plan and makes it an entirely invalid exercise. Until this is rectified the whole Plan is worthless.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1809  Respondent: 10896801 / Clare Fluker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The final major flaw in the Local Plan is of course that it was created on the basis that we were in the EU and whilst I voted to stay we are now in a post Brexit world and everything is likely to change. The Local Plan must clearly now be revised to reflect the fundamental changes that will result from this exit from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/481  Respondent: 10897217 / Warren Hogben  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1920  Respondent: 10897665 / Sue French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to GBC ignoring the NPPF regarding the Green Belt and for vastly exaggerating housing numbers from the SHMA 2015 and for not providing sound evidence for the ELNA 2015. The GBC Local Plan is not fit for purpose, as already stated by Sir Paul Beresford MP. Evidence Base

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3575</th>
<th>Respondent: 10897953 / Janice Hughes</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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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</tbody>
</table>

LOCAL HOUSING NEED

There does not seem to be any substantial evidence within the local plan for the alleged housing need in our immediate area. Whilst some increase may be justified, I object to the assumption that the area close to where we live is appropriate and that there is a clear and urgent demand for the scale of development that is proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1031</th>
<th>Respondent: 10898625 / James Hampton</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>
</tbody>
</table>

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2640</th>
<th>Respondent: 10899233 / Frederick Hookins</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3895  Respondent: 10900065 / Jenny and Guy Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to any removal of villages from the Green belt and to the disproportionate amount of development in one area of the borough and i object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3899  Respondent: 10900065 / Jenny and Guy Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to any removal of villages from the Green belt and to the disproportionate amount of development in one area of the borough and i object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/864  Respondent: 10900385 / Michael Mills  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/880  Respondent: 10900641 / E.J. Mills  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I strongly object to the lack of any evidence for the alleged housing need numbers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/55  **Respondent:** 10901121 / Bernie Hales  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. I object to the lack of any evidence for the alleged housing need numbers
2. I object to the lack of immediate provision for new schools
3. I object to the lack of immediate provision for Doctors Surgeries

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/4152  **Respondent:** 10902561 / Maureen Ruddock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. The ridiculously large numbers of houses proposed to be built in the borough particularly in the Horsleys where my family live. I understand that this huge number of houses has been arrived at from a Strategic Housing Market Assessment (SHMA) developed by a consultant’s mathematical model which has not been revealed in the plan nor to Guildford Borough Council (GBC). The proposed number of houses has then been further increased by GBC, the effect of which has been to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. The effect of this is to increase the population of West Horsley by circa 35%. It is both unfair and unreasonable to increase the population of an area so drastically - it will change the face of the Horsleys forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3935  **Respondent:** 10902817 / TJ Deacon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the figure of 693 new homes per annum being used as a basis for planning. As I understand, no evidence has been made available to substantiate this or if it has, it has not been made public at the time of launch of the Draft Local Plan. This is unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: PSLPA16/1030  Respondent: 10905825 / Bridgette Hampton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2148  Respondent: 10906145 / Joe Gervasio  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough; this is more than double the figure of 322 used in previous plans. The way students, so-called “economic need” (already questionable and now more questionable than ever post-Brexit) and affordability are calculated inflates the housing need.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is unacceptable for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2430  Respondent: 10910369 / Karen Doyle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/2431  Respondent: 10910369 / Karen Doyle  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3071  Respondent: 10910625 / Alyson Blackwell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that there has not been and demand that (a) there should be a significant challenge to the GBC scenario planning and (b) the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2921  Respondent: 10910753 / Heather Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan. Why are the council failing to publish this report?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4179  Respondent: 10910753 / Heather Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
In addition to this, I object to the fact that the housing need in this area has not been properly assessed and the number of houses needed seems to have been inflated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4378</th>
<th><strong>Respondent:</strong> 10910785 / Clare Curtis</th>
<th><strong>Agent:</strong></th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<tr>
<td>The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages. Proposed new economic development site proposals are on the opposite side of the Borough to West Horsley: Presumption in favour of Sustainable Development (Policy S1), Borough Wide Strategy (Policy S2), Homes for all &amp; Affordable Homes (Policies H1,H2).</td>
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<th>Comment ID: PSLPA16/2680</th>
<th><strong>Respondent:</strong> 10911425 / Andrew Gray</th>
<th><strong>Agent:</strong></th>
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<td>The Plan’s proposed growth is based on the latest SHMA report, which says that 693 homes a year are required by the borough, this is more than double the 322 figure used in previous plans.</td>
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<td>The Council will not publish the SHMA report, this figure cannot therefore be verified. This lack of transparency is not right for consultation on the Plan.</td>
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The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3431  **Respondent:** 10912513 / Sarah Green  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the inclusion of policy A43 of 7000sq m of industrial warehousing as the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. Slyfield Industrial Estate still has spare capacity and could accommodate any additional warehousing need if required.

2. I object to the number of 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3846  **Respondent:** 10912513 / Sarah Green  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1699  **Respondent:** 10915361 / Judy Young  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**OBJECTION TO GUILDFORD DRAFT LOCAL PLAN**

I wholeheartedly object to the revised draft plan which shows no substantiated evidence for providing the foundation for any sustainable future for our borough. This plan offers no convincing long term solutions to the problems that face future
generations – and would be a noose round their neck rather than offering a progressive, forward thinking plan that addresses the changing needs of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3807  Respondent: 10915905 / David Anness  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 evidence and justification for the housing need numbers. These cannot be based on any sensible analysis of local demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2796  Respondent: 10916193 / Ann and David Harrison  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. The housing targets for the whole of the Guildford Borough seem very unreliable and excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3852  Respondent: 10917985 / Alan Stephenson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is no plausible evidence to support the high level housing need stated in the Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1979  Respondent: 10918657 / Angus MacDonald  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3995  Respondent: 10918977 / Gillian Lachelin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to the housing number of 693 per year. At various meetings (including a GBC meeting) I have been to no one has been able to explain how this number was arrived at.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2428  Respondent: 10920001 / Jeff Doyle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3828  Respondent: 10920865 / Sebastian Forbes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Is there an accurate figure of how many new houses are actually required (not skewed by political bias)?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1235  Respondent: 10920961 / Mark Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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<tr>
<td>I object to the way that a “need” for student accommodation has been added to the “housing need” figure of 13,860 - a fluctuating figure as students only need the housing for 8 months of any year and in any case have no intention of living in the villages. Housing of this nature should be located on what is a very spacious University Campus where I am sure much of the revenue would be directed.</td>
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<td>I object to the figure of 693 new homes per annum being used as a basis for planning. As I understand, no evidence has been made available to substantiate this or if it has, it has not been made public at the time of launch of the Draft Local Plan. This is unacceptable.</td>
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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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4019  Respondent: 10923745 / Marwan Khalek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. The exaggerated “housing need” figure of 13,860 which is far too high. The way students, economic need and affordability are calculated inflates the housing need and this results in and leads to unnecessary development of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3166  Respondent: 10924609 / H Perryman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 693 new houses per year in the borough because it is far too high. The number is based on the model in the SHMA report, which the Council will not publish and so cannot be challenged. Approximately half of the number in the model is thought to be an increase in the number of students at the University. GBC should not be building accommodation on behalf of this business.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1851  Respondent: 10924769 / Christy Dadswell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The use of a “Black Box” method which has been used by GBC to derive the housing target is fundamentally flawed. At a recent meeting the leader of the Council was unable or unwilling to shed any light upon the methodology or parameters used within the model. The annual number of new homes required quoted in the draft Local Plan exceeds the needs of residents.

- The Local Plan has not factored in a reduction of student numbers as a consequence of Brexit nor does it factor in the housing stock released due to students, currently renting from private landlords, no longer taking out leases from the private sector due to falling student numbers and additional direct University Housing Capabilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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, in particular, more properties for first time buyers and for those wishing to downsize.

However, I OBJECT strongly to the scale of extra housing proposed in the Draft Plan because this is based on some fundamentally flawed calculations and a complete lack of understanding of the environment of the Horsleys.

CONTEXT
Firstly it is necessary to understand the context of the plan, particularly as it relates to the Horsleys.

1. The basis of the plan

A consultancy, GL Hearn, produced the SHMA but have not disclosed to the Council or to anyone else details of the input assumptions or mathematical model on which their calculations have been made. That their forecast is 70% above that of the accepted figure from other sources may give you some cause for concern. Without a full understanding of the assumptions, you cannot be sure that your plans are firmly based. This is not the right way to manage such a critical input to the local plan and as a consequence your predictions lack credibility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3429  **Respondent:** 10927841 / Frank Milton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the basis on which the housing requirements have been calculated. As they are not transparent they lack credibility.

1. I OBJECT to the final target housing number (based on a mathematical model which has not been disclosed) which is 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?

Attached documents:

**Comment ID:** PSLPA16/2070  **Respondent:** 10928577 / Johan Stalmans  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The scale of the proposed housing development in the Horsley area is totally inappropriate when compared to the existing number of houses in the area. The number of new homes proposed in the plan appears to have been generated from the Strategic Housing Market Assessment and further inflated, ostensibly to account for population growth (but using growth forecasts which are two-thirds higher than the national estimates for population growth in the borough). The basis of the numbers is highly questionable, being the result of a theoretical model (the algorithms and assumptions of which are not offered for critical review).

The proposed development would NOT respect the character and density of the local area, as is required by the National Planning Policy Framework.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There is no need for a 25% increase in the housing stock in Guildford Borough. This greatly exceeds any reasonable expectation for net household formation. The ONS predicts a 15% increase, but this will inevitably need to be reduced significantly once BREXIT is achieved. The 25% increase also includes a very basic fundamental error of double-counting, as highlighted in the submission by East Horsley Borough Council on 13th June 2016. I suggest you get some new statisticians. It is also wrong to suggest that such growth is being driven Central Government Policy. Under NPPF rules Guildford Borough Council is allowed to take into consideration the protection of the Green Belt and Areas of Outstanding Natural Beauty in setting its housing targets. Why is it not doing so? The Council HAS a choice and we absolutely REJECT the policy of "forced growth" that is 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:** PSLPA16/2720  **Respondent:** 10930945 / Peter Perry  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
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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:** PSLPA16/3639  **Respondent:** 10930945 / Peter Perry  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, that is more than double the figure of 322 used in previous plans.

This figure cannot be verified because the Council will not publish the SHMA report. This lack of transparency is deplorable for a realistic consultation of the Plan to be conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3960  **Respondent:** 10934689 / Adam Fox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
3. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4422  Respondent: 10939201 / Dylan White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I’m sure you’re aware that the UK is twice as crowded as Germany and three and a half times more crowded than France. We have an ageing population so can not go on increasing at the rate we are, hopefully BREXIT will put a stop to this unsustainable uncontrolled rise in population from the EU. We also need to cut back on numbers coming here from outside the EU which hopefully can also happen soon. As BREXIT has just been given the go-ahead, this reduction in numbers can not have been factored into this plan, therefore it is ‘out of date’ already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3094  Respondent: 10940833 / Natasha Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

I consider the "objectively assessed need" figure of 693 homes a year is too high.

• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes
  Page 13 of 17
  NJ Taylor-Objection to local Plan
  a year and the method changed to consider student housing need separately due to the distorting effects.
  • The current SHMA inflates the proposed housing figure due to a failure to correct for errors in the historical data
    for international migration flows, a issues with the way it considers students and affordability and
    a flaws in the method for estimating the number of homes needed to support job growth.
  • It is unacceptable that demographic and economic model assumptions have been withheld by the council and
    treated in secrecy by the council and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by
the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology
is I believe inaccurate; it inflates the needs of the borough by distorted student numbers.
However, it is based on "commercially confidential" modelling assumptions that cannot be checked or reviewed.
There is no transparency to this evidence base and it is therefore impossible to assess its accuracy.
This is not democratic and is not appropriate for consultation of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/3426  Respondent: 10941057 / Tim Green  Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the inclusion of policy A43 of 7000sq m of industrial warehousing as the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. Slyfield Industrial Estate still has spare capacity and could accommodate any additional warehousing need if required.

I object to the number of 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3840  Respondent: 10941057 / Tim Green  Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/811  Respondent: 10942081 / G J Teague  Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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1. 2. Housing Assessment

The number of houses planned in the Borough since the last consultation has risen to 693 p.a. over the next 20 years. The Foreword to the Plan (under the rubric "Key Facts") at tributes to the ONS in a footnote a prediction of a population of 162,188 by 2033.
Implementation of the EU Referendum decision last month, to which the new Prime Minister has publicly committed the UK Government, could well result in a further, potentially large, reduction in international migration to the UK over the period covered by the draft Plan. This must surely give pause for thought. The harm to the Green Belt villages and the Horsleys in particular will be irreparable if development is allowed to proceed on the basis of overstated projections. The ONS will have to revisit its forecast, the adequacy of which is now clearly in question.

Development of the Plan should be paused, and submission to the inspectorate deferred, to allow for updated ONS modelling to become available. Alternatively, given the current uncertainty, a more conservative approach - perhaps based on the level of growth envisaged in the current 2003 Plan - should be adopted with respect to predicted future new household formation for the next 8 - 10 years, and the number of new houses needed materially reduced, with the ability to reset at the end of the next parliament in 2025. By then the long term consequences of the Brexit referendum (including the effect(s) on economic growth) should be clearer, and adequate evidence of future needs capable of being generated. It is clearly untenable for the Plan to go forward in its current form, as if nothing had happened. It would be unreasonable not to adjust the Plan in the light of referendum, and in any event, submission in its current form would be non-compliant with the NPPF requirement (at para 158) to ensure the Plan is based on adequate and up to date evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>The Plan includes a Sustainability Appraisal (SA) from June 2016. This does not appear to address any of the foregoing specific issues in the context of the development envisaged for the Horsleys. In respect of transport, for example, no detailed work appears to have been undertaken to address the conclusion of the Initial Sustainability Assessment of 2013, namely that inadequate information existed to address the issue of the impact of high volumes of traffic on our communities. The SA (non-technical version) says (p.10) that transport/traffic constraints (sic) are widespread across Guildford Borough, and that it is not possible to conclude the likelihood of significant positive effects (sic), but nonetheless less states, wholly implausibly, that &quot;the Plan performs well&quot;. Promoting huge increases in new houses in rural villages without any detailed planning or committed funding for associated infrastructure is absurd. The Plan is not compliant with NPPF (para 182) as it does not adequately address infrastructure requirements.</td>
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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: pslp173/249  Respondent: 10944513 / Amber Ellis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the figure of 693 houses per annum in the borough being too high (Appendix D) GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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 calculation is disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/2757  Respondent: 10951105 / Richard Bray  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Major doubt concerning housing numbers – The Strategic Housing Market Assessment (not disclosed in Plan or to Council) is drastically wrong and the numbers in it have wrongly been inflated by Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPA16/923  Respondent: 10952705 / Moira Maidment  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

0 The "objectively assessed need" figure of 693 homes a year is too high.

0 A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to:

0 failure to correct for errors in the historical data for international migration flows,

0 issues with the way it considers students and affordability and

0 flaws in the method for estimating the number of homes needed to support job growth.

0 Its unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3740  Respondent: 10953249 / Charlotte Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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Attached documents:

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1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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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: PSLPA16/1605  Respondent: 10958753 / Ingrid Molossi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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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: PSLPA16/4306  Respondent: 10958817 / Steve Wright  Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<tr>
<td>I do not agree with the housing figure projections that has been published. No calculation method or facts have been substantiated.</td>
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<tr>
<td>• The housing figures do not take into consideration current/planned sites that are being considered for development. There are many sites that are not part of the local plan i.e. Rokers application for 350 houses.</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: PSLPA16/4345  Respondent: 10958913 / Alan Batterbury  Agent:</th>
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<tr>
<td>But because the council will not publish the SMHA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.</td>
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<th>Comment ID: PSLPA16/2128  Respondent: 10959009 / Rebecca Claridge  Agent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4495  Respondent: 10959265 / Inger & Ron Ward  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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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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INFRASTRUCTURE: Too little too late

- There is no new road bridge over the railway for our physically divided town and no central, all-directions bus interchange.
- Vague proposals for a “Snake” (Sustainable Movement Corridor) and A3 improvements offer too little too late.
• Land is not safeguarded for A3 tunnel entrances or the “Snake”.
• Residents are disturbed that no one has had a chance to look at a crucial piece of evidence that should have informed the Plan - the long awaited Strategic Transport Assessment.

HOUSING: *Inflated, ignores constraints and doesn’t address needs*

• Too high Housing Target proposed in the Plan – over 13,500!
• At 693 homes a year, this is over double the previous figure of 322.
• The Plan’s proposed growth is based on a Strategic Housing Market Assessment (SHMA) report which inflates so-called need, is distorted by student numbers, and is based on commercially confidential modelling assumptions that cannot be checked.
• All other Councils in Surrey, apart from Guildford, are applying “constraints” to reduce their overall housing figure (*see notes*).
• The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (eg Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford.

Councillors have made a political choice to open the floodgates to expand Guildford on the damaging scale proposed.

This Plan is unsound and unsustainable.

Councillors need to make improvements to the Plan before it is too late and irreparable damage is done to our beautiful historic town and the surrounding countryside

Protect Ockham and Ripley or ruin it, the choice is yours, there are plenty of derelict sites to build upon and so why not use them instead of taking away our space and air and greenery and beauty

Improve ugly sites

Leave our Green Belt alone

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/429  **Respondent:** 10959425 / Jan Lofthouse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **EXCESSIVE HOUSING NUMBERS**
   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.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/501  **Respondent:** 10959425 / Jan Lofthouse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Also I object to the draft Local Plan as the SHMA (Strategic Housing Market Assessment) figures seems to be overstated and have now been overturned by experts outside G B C which need re assessing urgently

You do not need to touch the green belt at all, your housing needs are incorrectly calculated

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/1651  **Respondent:** 10959425 / Jan Lofthouse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I understand the SHMA FIgures for Guildford B C are to be revised

Following BREXIT

and

Following errors made

I therefore object to the draft Local Plan as the Housing figures are incorrect

If you correct the figures my understanding is that at least 100 dwellings per annum for 20 years would be removed from the figures for Guildford Borough

So that is well in excess of 2000 homes and once that is the case, G B C really does not and should not develop green belt sites

I request that the figures be re visited

I request that G B C do focus now on derelict land, ghastly brown field sites and develop those and leave countryside alone

There is no need to touch 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:** PSLPA16/2531  **Respondent:** 10960033 / Lucinda Kalupka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
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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: PSLPA16/4540  Respondent: 10960353 / Trish White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2948  Respondent: 10962689 / Martin Ladd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/2949  Respondent: 10962689 / Martin Ladd  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3472  Respondent: 10962785 / Derek Gilmore  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10963137 / Gabrielle Erhardt</th>
<th>Agent:</th>
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<td>I strongly object to the lack of evidence for the alleged housing need numbers. There has repeatedly been a failing to provide this evidence.</td>
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<tr>
<td>I support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter. I am appalled that any Local Council can produce a draft plan that is so flawed. You have just lost my vote as I will feel I can never trust you again. Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Transport evidence is not yet fit for use and major transport issues are unresolved eg another river crossing, a central bus facility.</td>
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<th>Respondent: 10967041 / Ashley Brown</th>
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<td>Please come to your senses, stop letting Development Companies ruin our home environment. Stand up to them and for your constituents and stop wasting our money on these flawed reports</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: PSLPA16/3726</th>
<th>Respondent: 10967329 / Steve Johnson</th>
<th>Agent:</th>
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<td>Major doubt concerning housing numbers - The inflated number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant's mathematical</td>
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 resumes, I am concerned about the proposed number of new homes in the plan. This is based on an inflated Strategic Housing Market Assessment (SHMA) that was generated by a consultant's mathematical model. The figures are based on invalid assumptions and must be revised down to reflect the true economic conditions. For example, the ONS figure already includes economic growth, but affordable housing is overestimated based on GBC’s existing policies. GBC has decided to pursue AGGRESSIVE EXPANSION and Forced Growth and the residence DO NOT SUPPORT THIS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents:
model which is not revealed in the plan. Nor, apparently, to Guildford Borough Council (GBC). This SHMA target housing number is then further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households - greater than any other single area 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: PSLPA16/2863  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Strategic Housing Market Assessment figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposal to consider required increase in housing at 693 homes a year more than doubles the figure of 322 used in all previous versions of the Plan. The continued lack of transparency suggests subversive and unverifiable figures which will be open to legal challenge if not included in this consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3319  Respondent: 10968481 / Vivienne Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the overall number of new houses in the plan - there is insufficient evidence to justify this level of development in the Borough and inadequate plans to deal with the significant increase in traffic that would be generated as a result. The M25 and A3 are already significantly congested, not only at peak times but now often during the day too - the number of new homes proposed would significantly add to the problem and the environmental damage caused by pollution.

Please confirm that you have received this objection and that it will be shown to the Planning Inspector

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3395  Respondent: 10968481 / Vivienne Ottaway  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Appendix d: evidence base

6) I object to the overall number of new houses in the plan - there is insufficient evidence to justify this level of development in the Borough and inadequate plans to deal with the significant increase in traffic that would be generated as a result. The M25 and A3 are already significantly congested, not only at peak times but now often during the day too - the number of new homes proposed would significantly add to the problem and the environmental damage caused by pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/729  Respondent: 10969249 / Kim Taylor-Peat  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/498  Respondent: 10969441 / Mark Woodman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I can find no evidence for the alleged housing need numbers of 693 a year which is more than double the previous figure of 322 in 2012.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3131  Respondent: 10972065 / Sarah Cocke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Section page number  Document page number
Page 404 of 933  697
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3134  Respondent: 10972065 / Sarah Cocke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.

- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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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>PSLPA16/1247</th>
<th>Respondent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3025  Respondent: 10987745 / Ian Pigram  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object on evidence based grounds to the increase in housing around Send because the Employment Land Needs Assessment of 2015 demonstrated a significant (80%) reduction in housing needs from the 2013 ELNA. The design premiss for road infrastructure planning is therefore similarly flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2291  Respondent: 10987841 / Marion Bastable  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D) GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3701  Respondent: 10987905 / Marika Chandler  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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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? ( )

6) I object most strongly to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1988  Respondent: 10990145 / Anne Lee  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **APPENDIX D**

**I OBJECT** to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

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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: PSLPA16/140  Respondent: 10990465 / Victoria Bean  Agent:
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 failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2085  Respondent: 10990657 / Diana Owen  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not understand where the figures have come from that have decided this incredible increase in the number of houses that are required in the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3508  Respondent: 10992225 / Emma Ringshaw  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough, since this figure is too high and not supportable (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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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: PSLPA16/516  Respondent: 10992417 / Philip Erhardt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Strategic Housing Assessment as being far too high and unbalanced across the borough.

I object to 700 new houses per annum in the borough as being too high (Appendix D).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4329  Respondent: 10992801 / Martine Szabo-toth  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1728  Respondent: 10992833 / Amanda Verny White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to

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Page 411 of 933  Document page number 704
• failure to correct for errors in the historical data for international migration flows,
• issues with the way it considers students and affordability and
• flaws in the method for estimating the number of homes needed to support job growth.

• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3730  Respondent: 10995585 / Patricia Swain  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Housing number of 693 is far too high. Building houses on this scale in the Borough will completely destroy its character. People want to live here because of its beauty. Guildford can continue to be a successful business centre without having to grow - or where will it end?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1675  Respondent: 10997121 / Rob Curling  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:** PSLPA16/2540  **Respondent:** 10998081 / David Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

It is my assessment that the submission plan is unsound due to the number of errors in the plan, the poor quality and lack of transparency in the evidence base, the accessibility of the evidence base, including the fact that huge files have again been used and these are not accessible to those with poor internet connections. There is also considerable lack of clarity.

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 the fact that in the first instance no evidence has been given to substantiate the alleged need for new housing units, i.e. this level of development is not necessarily needed.

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 number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) generated by a consultant's mathematical model which is not revealed in the plan, nor apparently has it been revealed to Guildford Borough Council (GBC). The Office of National Statistics has acknowledged a mistake in the numbers used by the SHMA and have updated their predictions, yet these revised figures are not reflected in the GBC Local Plan. The original unsubstantiated SHMA target housing number has been further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households – greater than any other single area in the Borough.

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? ( )

However I OBJECT strongly to the scale of extra housing proposed in the Draft Plan because it is based on some fundamentally flawed criteria.

1. I OBJECT to the basis on which the housing requirements have been calculated. A consultancy, GL Hearn, produced the SHMA but have not disclosed to the Council or to anyone else details of the mathematical model on which their calculations have been made. This is not the right way to manage such a critical input to the local plan and as a consequence your predictions lack credibility.
2. I OBJECT to the final target housing number (based on a mathematical model which has not been disclosed) which is 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?

Attached documents:
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<th>Comment ID: PSLPA16/960</th>
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3) 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.

**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 exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

**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 lack of evidence for the alleged housing need numbers

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But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on 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:** PSLPA16/3645  **Respondent:** 11007393 / James Culmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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 all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the
previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2523  Respondent: 11007425 / Kate McIver  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1658  Respondent: 11007713 / Grahame Crispin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the validity of Guildford Borough Council’s evidence base used to demonstrate a need for the above Policies being objected to (namely P2, A42, A43, A43a, A44).

Required Employment space versus 2015 ELNA & 2013 ELNA has been overstated.

Housing needs (2015 SHMA) have been overstated by including, for example, foreign students.

The number of houses that is suggested as being required has been exaggerated by GBC; a more realistic lower requirement could be satisfied by the re-use of brown-field sites, and Green Belt land does not need to be encroached into.

At the time it was voted upon (24/5/16), Guildford Borough Council’s Local Plan did not take account of Guildford Borough Council’s Transport Assessment (not available until weeks afterwards on 6/6/16).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1101  **Respondent:** 11008225 / Russell Pascoe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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**Comment ID:** PSLPA16/4388  **Respondent:** 11009057 / Lucy Fairley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Population growth
I have major concerns in relation to the assumed population growth and by extension the 13,860 new homes this suggests are required. Firstly, the numbers are based on pre-Brexit projections for economic and population growth. There is a strong likelihood that these numbers should now be revised downwards.

It is utterly irrational to embark on a radical transformation of the borough without a clear Housing Target. The actual figure of 13,860 new homes is unsubstantiated and has not been scrutinised by Councillors despite repeated requests for debate. Equally unsound is the fact that the assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. The fact that this contractor is used by a number of local authorities should not be used as confirmation of the veracity of the figures, and the complete lack of transparency concerning these projections is quite frankly shameful. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. Yet we are prepared to change forever the face of our county on this basis? I therefore object to the Local Plan based on

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2360  Respondent: 11009281 / David Foot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 failed to provide sound evidence in terms of the Employment Land Needs assessment which shows that industrial space at Burnt Common is no longer needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPA16/1756  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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3. 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 the light of the EU referendum result the calculation must also be reassessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/624  Respondent: 11014401 / Peter Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In fact the case for building houses in the South of England at all has not been made – the UK birth rate is less than 2 children per family - the perceived demand for housing is artificially fuelled by people living longer and by the high level of immigration into the country. The first of these two points means that you should be building retirement homes not housing estates and the effects form the second issue needs to be re-visited following the country’s decision to leave the European Union and the general position that the UK should strengthen its immigration measures from both the EU and other nations outside the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3961  Respondent: 11015329 / Nick Riederer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/604  Respondent: 11015489 / Lorraine Pipe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) 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.
Strategic Housing Market Assessment (SHMA)

I object to the SHMA figure set at 693 houses in the borough per annum (appendix D). This figure is unacceptably high. With almost 14,000 houses planned over a 15-yr period from 2016-2031, the number of houses is flawed. Furthermore, the model used to determine this need has so far not been shared and has been declared flawed by various sources. The population growth is not sustainable and cannot be allowed to go ahead. In Horsley, this equates to a 35% increase in housing, which is higher than in any other proposed area, and on greenbelt, disregarding planning policy advice which clearly states that greenbelt should be a constraint to development. For the reasons above, Horsley cannot sustain this level of development and the number of houses proposed MUST be revised.

Finally, the local plan is proposing 9,000 new houses on greenbelt. The NPPF requests that any change in greenbelt boundaries must demonstrate exceptional circumstances. It is not enough in the eyes of the law to state housing need as an exceptional need. As no exceptional circumstances have been stated, greenbelt boundaries should not be changed in defining the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Need for Expansion - Is it really necessary?

The arguments that have been put forward are not convincing - who is right? It seems that such expansion is based on evidence that must be questioned again. And if it is:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
18.I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
• The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
• issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
• The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
• The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have 4 key reasons for objecting to these plans:

I OBJECT TO THE LACK OF SOUND EVIDENCE BEHIND THE LOCAL PLAN

• **I OBJECT** to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly dubious. These include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area. This is even before the EU referendum result, which will inevitably impact on demand for housing in the area.

• **I OBJECT** to the lack of transparency in justifying the requirement for both new homes and the industrial developments. There has been no public scrutiny of the SHMA and even local councillors and Parish Councillors have not been able to review the numbers. In fact, the SHMA model has been calculated by a contractor on behalf of GBC and that the resultant commercial sensitivity of this data prohibits wider review. This lack of transparency builds mistrust in the basis for the GBC numbers and suggests that they may be based on unrealistic data.

• **I OBJECT** to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000. This suggests that GBC are intending that the Borough will be building homes to meet the need of other areas, such as Woking. Rather than destroying the Greenbelt, other brownfield sites should be sought in urban areas, even if they are outside the Borough. If not, Send and Ripley will become a conurbation of Woking and Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Comment ID: PSLPA16/549  
**Respondent:** 11028801 / Sandy Conway  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*

In view of the continuing proposal for a huge programme of house building under the Local Plan, I wish to protest for the following reasons:

1. Details

As far as I can ascertain, no new Assessment of Need has been published, so those wishing to object must do so without full information. This is unsatisfactory and unjust.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPA16/4221  
**Respondent:** 11028929 / Christopher Webb  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*

I strongly object to the Guildford Plan.

On the grounds that despite repeated request from various bodies there has been a total lack of transparency over how the number of required houses has been derived. This is now further compounded by Brexit, as a significant portion of the housing requirement evolved around migration to the Guildford area which with Brexit is now a flawed assumption.

In addition no account has been taken as to the infrastructure requirement to satisfy a growth in housing, Guildford is already grid locked for a significant proportion of the working day. In addition to which services such as water and sewage are already stretched to capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPA16/230  
**Respondent:** 11029409 / John Lay  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*

8.) The figure of 693 houses per annum in the Borough being too high. ( Appendix D )
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<tr>
<th>Comment ID: PSLPA16/1407</th>
<th>Respondent: 11029409 / John Lay</th>
<th>Agent:</th>
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<th>Comment ID: PSLPA16/3232</th>
<th>Respondent: 11032513 / Mary Candy</th>
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<td>I object to the lack of any evidence for all the alleged housing need numbers. Evidence Base</td>
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<th>Comment ID: PSLPA16/2781</th>
<th>Respondent: 11033185 / Sarah Lee</th>
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<td>I object to the Strategic Housing Market SHMA figure of 693 houses per annum as GBC refuses to publish the report and verify the figures.</td>
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<th>Comment ID: PSLPA16/1622</th>
<th>Respondent: 11033985 / John Peachey</th>
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I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way student's economic need and affordability are calculated inflates the housing need. I believe that the SHMA of 2015 is highly questionable as the number of foreign students has been wrongly used to inflate the housing need. The figure of 13,860 houses is excessive, as a population increase would only need about 8000 homes at an average of 2.5 persons per house. About half of these houses could be built on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4341  Respondent: 11036129 / George Dokimakis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, we are calling on the Council to be transparent and provide a full and detailed analysis of our development SHMA targets. We believe that a good development plan is integral to this Borough’s future and that our residents will support developments where transparency exists and all other options have been considered and exhausted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/347  Respondent: 11036321 / Vinciane Ollington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the lack of any evidence for the alleged housing need numbers

Nowhere in the Plan document can I find an explanation for why new houses need to be built other than the obvious that there are too many people. But this is addressing the problem in the wrong way. The problem of overpopulation is due primarily to the massive influx of immigrants. Successive Governments have failed either to listen or act on public opinion on immigration into the UK. Some in the last government have at last acknowledged that they failed spectacularly to control the numbers of people entering the UK from Eastern Europe and elsewhere resulting in serious problems of overcapacity. It is sheer madness and foolishness to try and resolve the problem of overpopulation by creating even more problems building more houses and destroying the green belt to achieve this.

GBC should not punish local residents for the errors of central government. Its residents will applaud GBC for standing up to central government and the constituents will have the confidence to re-elect GBC in the future if they properly support their constituents.

1. I object to the limited consultation period The Council, having sneaked this proposal in at the last minute without any consultation whatsoever with the community, has only allotted six weeks to register objections to a document over 1,800 pages, this is half the usual time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the continued use of poor quality evidence base and lack of sound property market research that relates to the local market in Guildford. The documents providing key evidence are unsound unreliable and inconsistent because:

- key parts of the evidence base are flawed or based on withheld assumptions. The SHMA by GL Hearn has been found to be flawed and based on unverified and unscrutinised methodology. The provider of this assessment (GL Hearn) have not revealed their workings by which they produce the “housing need number” on behalf of the GBC. GBC in turn have failed to request this information from GL Hearn by not enforcing their Contract of Services with the said GL Hearn, which can be found in the GBC (Appendix 1) Standard Terms and Conditions of Provision of Services which may be seen on the internet. One must conclude therefore that because of the inability of GBC to inform the consultation process of the information required, the SHMA should be disregarded for the purposes of evidence supporting this local plan.

- the latest SHMA 2017 still inflates the housing target figure because it is based on substantial errors in estimates by ONS of student migration flows where it is probable that flows out of Guildford have been under estimated by large amounts. This has been researched by a company SMSS on behalf of the GRA (Guildford Residents Association). It has led to a compelling conclusion that the report by GL Hearn may have overstated the need for homes in the borough by 25%. The ELNA has also been criticised for its lack of quality and accuracy. The argument for proposed industrial development at Burnt Common in the Green Belt and expansion in Surrey Research Park into the Green Belt based on "there is the possibility that some pipeline developments may not come forward..." is extremely weak and does not amount to good reason or exceptional circumstances for this extent and density of development. There are unused consents dating back many years which have not been taken up. Why? Because there has not been the demand and it is not proven in this evidence.

-I object to the intrusion into Green Belt for the purpose of local plan process. There are no exceptional circumstances that justify this. The plan would be able to identify and accommodate development needs in Guildford's urban areas and villages if it were based on realistic analysis without impinging on Green Belt. This is what government guidance has said. This is achievable if GBC lowers its housing and development target to realise what is actually needed. Brownfield and previously developed areas have the space to accommodate. If it cannot, it need not plan for so many houses or units. GBC have through this version of draft local plan 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 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 be restricted”.

The manner in which GBC has approached the local planning process has clearly been from a landowner/developer point of view. This is wrong because the local plan is for the local people not for the developers/commuters or short term gain. The plan should provide protection of the boroughs’ assets for future generations living in the borough, i.e Green Belt, AONB etc first and then plan realistically according to need as agreed by local residents, and plan improvements for infrastructure before committing to development. Therefore a more sensible realistic approach is required, whilst showing the NPPF will be adhered to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the policies providing for the insetting of certain villages in the borough & in particular to the insetting of Effingham village where I have been a resident for the past 28 years. I believe the relevant policies are P2 (Green Belt-Page 48) & D4 (Development in urban areas & inset villages-Page 106).

The comments that follow are specifically directed at the policy to inset the village of Effingham but could also apply to the other inset villages.

Policy P2 states that “We will continue to protect the Metropolitan Green Belt ………………against inappropriate development “.

However, in the introduction (para 4.3.13) , it states that 15 villages will be inset. I fail to see how this is protecting the Green Belt.

In para 4.3.16 it states that “exceptional circumstances “ are required to amend Green Belt boundaries. But there is no attempt to demonstrate what these exceptional circumstances are; instead there is a just a statement that GBC consider that they exist.

The inference from para 4.3.12 is that Effingham no longer makes an important contribution to the openness of the Green Belt. But there is no justification of what has changed to demonstrate exceptional circumstances.

In para 4.5.50 (part of reasoned justification of Policy D4) there is a reference to development in villages being very limited & historically development has been focussed in the urban areas of Guildford & Ash & Tongham only. But again there is no explanation of what objective data this is based on. If you look at the Census’ of 2001 & 2011 , the growth rate of housing in Effingham (washed over by the Green Belt) is higher than Merrow (part of the urban area of Guildford) , which is not washed over by the Green Belt. Furthermore, the rate of increase in housing stock in Effingham during this period is faster than the average for the borough.

The overriding theme running through the report is that there is an unmet housing need & that this cannot be met by building in the urban area of Guildford alone & therefore villages previously washed over by the Green Belt need to be inset.

To determine which villages should be inset, GBC appear to rely on the work undertaken by Pegasus & contained within their Green Belt & Countryside Study. Having reviewed this study, I believe that the methodology adopted is subjective & contains incorrect conclusions. There are many areas of the study that I believe are flawed but I have just focussed on the main areas below.

In stage 1 of the methodology (assessing the openness within each village) , Pegasus continue to use the concept of a “perceived village area” to justify the inclusion of housing that is in Mole Valley but in turn have not included open areas such as Rolls Farm thus distorting their analysis. The perceived village area also ignores actual boundary markings along the A246 so it is very subjective. Their housing density analysis is not an objective approach to measuring housing
density. They do not use a numerical guide which would be more normal. So, for example, they describe as high density the two storey detached residential development located on Effingham Common Road with medium to large garden plots enclosed by Thornet Wood to the east. The Google earth snapshot of this area clearly shows that this cannot be regarded as high density. Nor are the houses enclosed by Thornet Wood. The actual density of housing in this area identified is 3.5 /acre or 8.6/hectare. This simply cannot be regarded as high density.

Of the 14 areas identified on the stage 1 map, Pegasus identifies 3 as high density (but with no numerical justification), 7 as medium (again with no numerical justification), 3 as low & 1 as open farmland. Browns field & KGV playing fields are classed as low density. A detailed analysis of the area covered shows that the Pegasus analysis is wrong. Furthermore, Pegasus concluded that as 3 were high density the whole of the perceived village area exhibited a high density of development. This is an incorrect conclusion & cannot be relied upon.

In their Stage 2 analysis (assessing the locations of potential Green Belt boundaries), Pegasus ignore the NPPF requirement to define boundaries clearly using physical features that are readily recognisable & likely to be permanent. They continue to use treelines, hedgerows & woodlands to derive new boundaries. This simply cannot be regarded as likely to be permanent. Furthermore, some of the features used continue to be in Mole Valley.

In summary, the Pegasus study is flawed. Effingham is an open village with a great deal of open space within the village. To suggest otherwise is a distortion of reality. Furthermore there are strong connections to the Green Belt beyond the village & accordingly the village makes an important contribution to the openness of the Green Belt.

In conclusion, for the reasons stated above, I object to the insetting of the village of Effingham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2171  Respondent: 11039681 / Bruce Jeffreson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2436  Respondent: 11039681 / Bruce Jeffreson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/384  Respondent: 11040449 / Rosalind Pollock  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2/ Where is the evidence to prove that we need so many houses in our area?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3783  Respondent: 11040481 / D G Spratt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at **4.5 times the rate of population increase during the period 2001 to 2011**. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1565  Respondent: 11040609 / Simon Long  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
18. OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the local plan as a whole, as the Borough has failed to provide proper evidence of the need for such a large amount of housing and for the appropriateness of most of the development.

I believe the Local Plan 2014 lacks valid research and evidence of need; lacks planning for infrastructure improvement already needed without further development of the area; and is being rushed through using the wrong Regulation (19). It must be properly reviewed and consulted fully under the correct Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2992  Respondent: 11041601 / Robert Bayley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Once again the “revised” Local Plan circulated by Guildford Borough Council is based upon flawed arguments, inaccurate information and in many examples a complete disregard for rational and intelligent thought.

I OBJECT to the Local Plan in its current state in its entirety and have outlined some key areas below.

UNFOUNDED HOUSING NUMBERS

I OBJECT to these statistics.

There is a total lack of transparency concerning the model used for estimating population growth and the required number of new houses to meet this.

The Local Plan is based on a population increase which is almost 70% HIGHER than the official national estimates for population growth in the Borough.

How can an unjustified number like this be used as a basis for a Local Plan? This would mean, for example, a 35% increase in households in West Horsley alone – an area already suffering from aforementioned infrastructure issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2753  Respondent: 11042433 / Sam Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base
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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3067  Respondent: 11042433 / Sam Thompson  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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While there is a need for additional affordable housing in the borough, selling full price houses in expensive areas where the average house price is £400k at a 20% discount to qualify as “affordable” is in reality not affordable to many first time buyers and key workers. A better strategy needs to be considered in this instance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2632  Respondent: 11043425 / Melinda McLean  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 we have not been given any evidence for the need for more housing in this area. Ripley in particular has fulfilled it obligations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3463  Respondent: 11044129 / Christopher Barrass  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base 
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: PSLPA16/3498  Respondent: 11044129 / Christopher Barrass  Agent:
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I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

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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:** PSLPA16/834  **Respondent:** 11044353 / Michael Frayn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1714  **Respondent:** 11045761 / Sean Dowdeswell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the proposed new housing numbers. The Strategic Housing Market Assessment mathematical model has not been revealed in the plan. I am therefore confused as to how a population increase in the Borough, which is estimated at 70% higher than the official national estimates is calculated?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/2087  **Respondent:** 11046593 / ANGELA GUNNING  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Finally, we are calling on the Council to be transparent and provide a full and detailed analysis of our development SHMA targets. We believe that a good development plan is integral to this Borough’s future and that our residents will support developments where transparency exists and all other options have been considered and exhausted.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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I object as this local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3130  Respondent: 11047873 / Mary Waldner  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. SITES - POLICIES A1 TO A57

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3135  Respondent: 11047873 / Mary Waldner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/3885  Respondent: 11048481 / Patrick Oven  Agent:
The proposed Local Plan, both generally and specifically as it affects the Send Ripley and Clandon areas of the Borough is fundamentally flawed, appears to be developer, rather than need driven, and has grossly over-estimated the housing and business needs of the borough, disregarded the principle of the Green Belt, and utterly ignored the capacity of the available infrastructure to cope with further development. The housing need for Guildford Borough appears to have been grossly exaggerated, a suspicion not allayed by the refusal of the Council to disclose the basis on which it reached its SHMA. The Council has also not fully utilised “brownfield” sites before considering the greenbelt ones, another indication of this plan being largely developer led, as greenbelt is cheaper and easier to build on. None of the areas now proposed for development in so far as the Send area is concerned in the plan being submitted to the Inspector were in either the original draft plan nor its amended counterpart.

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Attached documents:
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**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/218</th>
<th>Respondent: 11051521 / J and M Baylis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td><strong>COMMITMENT TO PERIODICALLY REVIEW THE LOCAL PLAN</strong></td>
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<td>1. The proposed Local Plan has a long period, 2013 to 2033, thirty years. The previous 2003 Plan had a period of only three years (to March 2006), though it is still current after thirteen years. Much can change in thirty years, and one would expect the Plan to include cognizance of that.</td>
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<td>2. The proposed Local Plan is premised on certain predictions of population and economic growth. Such predictions are always subject to error, and the likelihood of error grows the further the predictions extend into the future. Indeed, the certainty of predictions thirty years ahead must be very low indeed.</td>
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<tr>
<td>1. Because the proposed Local Plan has such a long time scale, one would expect it to include specific review dates or mechanisms. Paragraph 153 of the NPPF states “Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances”. Circumstances are bound to change considerably over thirty years, and may change significantly over much shorter time scales.</td>
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<td>2. The only reference in the proposed Local Plan to review is paragraph 1.19 in the chapter on Monitoring Indicators. It says: “We will review the Local Plan, if required, by using the outcomes of the Annual Monitoring Report(s). As part of a review, we will consider the proposed level of new homes and employment land. We will examine all available information and, if necessary, undertake further work to develop our evidence base. Should evidence suggest that we are not meeting our objectively assessed need, various options, including identifying potential new site allocations and requesting assistance from neighbouring authorities, will be considered.” This statement covers any need to make upward adjustments, but makes no reference to any need to make downward adjustments.</td>
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3. The most contentious issue in the proposed Local Plan is the housing target, which has been set equal to the Objectively Assessed Need (OAN). The OAN is taken from the West Surrey Strategic Housing Market Assessment (SHMA), Guildford, Waverley and Woking Borough Councils, Final Report September 2015. The chapter on Monitoring and Review in the Final Report states:

“10.58 Through a proactive monitoring process it will be possible to maintain and develop understanding of the housing market, building on the outcomes of the SHMA. It will allow the implementation of policies to be tailored to evolving circumstances and inform future policy development.

10.59 Long-term monitoring which addresses indicators of housing need, market signals relating to supply-demand balance, and the housing supply trajectory can inform future development and implementation of planning policies for housing provision.”

The SHMA therefore foresees a need to review, and makes no presumptions as to what adjustments, upward or downward, may be necessary.

1. The Draft Guildford Borough Infrastructure Delivery Plan 2016 is much more positive than the proposed Local Plan as regards review. It states:

“1.2. This draft IDP will be subject to change up to and potentially during the Independent examination of the draft Local Plan. The IDP Infrastructure Schedule is a ‘living document’ that will be reviewed and modified as required throughout the plan period as further information becomes available in order to ensure that it remains up to date.”

There has been massive public disquiet concerning the housing target and the consequent need to build on the Green Belt. The OAN itself has been the subject of detailed criticism. My judgement is that the OAN predictions are fragile. They depend greatly on predictions of population growth, and much of this is ascribed net international immigration. In the present political climate predictions of immigration must be subject to much uncertainty.

I judge that the proposed Local Plan should include an explicit commitment to review its key targets, especially the housing target, every five years, say. This commitment should use positive wording and should cover all eventualities be they upward or downward.

9. At the very least, the wording of paragraph 1.19 should be amended along these lines

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
maximise the number of homes in order to boost its income rather than actually meeting any rational housing need. As this drives so many of the other unacceptable features of the plan, the LDP should again be rejected and GBC should actually listen to the voices of the residents and plan in a measured, reasonable, and sustainable manner that doesn’t seek to destroy the wonderful heritage that Surrey provides. Do not be the council that presides over the destruction of centuries of countryside at the behest of developers pushing for profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3103  Respondent: 11053825 / Claire Owen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2953  Respondent: 11054049 / Clare Goodall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2956   Respondent: 11054049 / Clare Goodall   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

APPENDIX D

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

  ◦ The “objectively assessed need” figure of 693 homes a year is too high.
  ◦ A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
  ◦ The current SHMA inflates the proposed housing figure due to
failure to correct for errors in the historical data for international migration flows,
issues with the way it considers students and affordability and
flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My letter is couched in general terms but nevertheless should not be disregarded as I can see the implications and effects of the proposed plan and to which I OBJECT.

It is quite clear from all the meetings and conversations/reports that I have followed that your plan is deeply flawed, is not impartial, is for economic growth rather than local need and is based on contortions of any ‘evidence’ used to fulfil criteria for these goals.

The primary OBJECTION is to the housing numbers (hotly disputed) for the whole of Guildford area. This has never been substantiated and it appears that the number stated is based on a Strategic Housing Market Assessment which has never been revealed. Only recently have we been advised in the news that demand for housing in recent months has dropped. The inflated number of new houses required in the Guildford area would deal with a population growth higher than official national estimates in the borough with more than a fair share in the Horsleys. There is no explanation of why, since the consultation on the 2013 plan, the target has been raised from 232 homes per year to over 652.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4037  **Respondent:** 11070113 / Alison Hague  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.
2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that the Council was required to give proper consideration to constraints.
3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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Attached documents:

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Comment ID: PSLPA16/4039  **Respondent:** 11070113 / Alison Hague  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

16. APPENDIX D
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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA/16/4347  **Respondent:** 11071649 / Martin Southcott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I believe that the Objectively Assessed Need figure of 693 homes per annum for future housing is excessive and based on flawed calculations within the SHMA, as highlighted by DRA's independant consultants.

Guildford's OAN should also, like all other Council's in Surrey, take account of constraints. For Guildford, inherent constraints include:

- the lack of infrastructure (particularly transport infrastructure) affecting road travel and causing serious congestion within the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA/16/2971  **Respondent:** 11074465 / Louise Vaughan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

1. **SITES - POLICIES A1 TO A57**

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1. I object to the identification and allocation of sites in this Plan without regard to Green Belt, infrastructure, or other constraints. The Plan says that “allocating these sites does not grant planning permission for development”. However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council has received about individual sites ever since the Issues and Options consultation in 2013. The Plan has hardly changed since the Council received
2.000 objections to its first draft in 2014. The Inspector considering the Plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition, since it was produced the EU referendum decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt, as well as infrastructure (most notable roads) considerations, all represented constraints that should have been taken into account in determining the final housing number. Accordingly in this regard my objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly, I believe the Council did not properly consider constraints and that its decision-making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt, then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances that are argued in favour of development at that particular site. There is no evidence this has been done. Instead the Council has appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year, and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to:
  - Failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability, and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is, I believe, inaccurate. It inflates the needs of the borough by distorted student numbers and is based on commercially confidential
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This email contains my response to the Proposed Submission Local Plan: Strategies and Sites June 2016

I strongly object to the above proposed Local Plan on the following grounds:

1. The assumptions behind the projected population growth on which the plan is based are fundamentally flawed, as further explained later. Moreover the result of the recent referendum to leave the EU will have a major impact in terms of decreasing the influx of people into the Borough, and therefore renders out-of-date the projections made before the referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/878  Respondent: 11086433 / Colin Carmichael  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3889  Respondent: 11086433 / Colin Carmichael  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Major doubt concerning housing numbers: the estimates of housing requirements used are not soundly based with a disproportionate impact on the Horsleys

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3598  Respondent: 11095905 / Joanna Holden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Other objections
2. I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green. The way students, economic need and affordability are calculated artificially and erroneously inflates the housing need and key methods used to calculate the housing need have been withheld using excuses of dubious legality. The majority of students at the university do not settle in Guildford, are not long term residents and should therefore be outside the scope of housing figures on the plan. No account has been taken of the "Brexit" factor, which is likely to further reduce demand from housing from non-UK nationals as migration is likely to be more tightly controlled.

1. Demographics would appear to indicate that the Guildford area, and Surrey as a whole, has an ageing population and a lower ultimately this will lead to the housing need being lower as more people will die, with fewer replacing them, so the existing housing stock could be sufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3894  Respondent: 11097153 / Rupert Eastell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My other comment is that the Plan is based on a "target housing number" which is substantially greater than expected population growth in the Borough. If this is deliberate in order to find a compromise then the whole Plan should be thrown out. Your Plan provides for a 35% increase in houses in a country village like West Horsley. That is clearly wrong on all counts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1563  Respondent: 11098241 / Sammy Chalk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3751  Respondent: 11098369 / Neil & Nicki Covington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/3406  Respondent: 11100033 / Penny Orpwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The plan has been based on the intention of adding 13,860 new homes to Guildford Borough over the 2013 - 2033 period, this represents a massive increase of 25% of the housing provision in just 20 years, the need for this huge increase has not been explained or justified, as neither has the basis on which the SHMA has been calculated. It is also the case again without justification that GBC has enhanced this figure to a level which is 70% higher than the official national estimates for population growth than the Borough. The GBC has no mandate from its residents to provide this additional level of housing and therefore has completely departed from the ethos of “localism” in planning policy.

The effect of Brexit will be to reduce the demand for housing nationally and the ability of the building industry to provide it, making GBC’s figures even more extraordinary

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3835  Respondent: 11100193 / Michael Turner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent . The current SHMA inflates the proposed housing figure due to the following factors:· the failure to correct for errors in the historical data for international migration flows;· the way it inflates the requirements of students; and· the flaws in the method for estimating the number of homes needed to support job growth. The Green Belt and Countryside Study does not look strategically at options for development in major settlements beyond. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Exceptional circumstances do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages. The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19
consultation. It is apparent that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points. Evidence on bus travel is compromised because no clear location for a bus interchange is proposed. No information has been provided on the demand for and capacity of rail services, and the main line to London is already extremely busy in peak periods. Information about the town centre as regards traffic, buses and parking is lacking. The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (e.g. closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patters in relation to the threat of the internet and the study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford. Key parts of the evidence are missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan. The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement. It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy. Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, ground water and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. It would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. It would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to government policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site. The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation. The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.” Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation. GBC has failed to provide an Infrastructure Report in time for and as a part of the...
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<th>Respondent: 11101345 / Katja Schilling-Bayley</th>
<th>Agent:</th>
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<td>Once again the “revised” Local Plan circulated by Guildford Borough Council is based upon flawed arguments, inaccurate information and in many examples a complete disregard for rational and intelligent thought.</td>
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<td>I consider the calculation of housing need is unsubstantiated. The model has not been scrutinised and fundamental assumptions are flawed. Housing target is unconstrained;</td>
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<td>18. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)</td>
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<td>The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed.</td>
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<td>There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.</td>
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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPA16/3748  Respondent: 11150913 / Sarah Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to:
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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:** PSLPA16/654  **Respondent:** 11160001 / Andy Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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   - flaws in the method for estimating the number of homes needed to support job growth.
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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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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:** PSLPA16/4232  **Respondent:** 11458241 / Bewley Homes  **Agent:** Bewley Homes Plc (David Neame)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Representations in Relation to the Sustainability Appraisal (“SA”)

OBJECT: UNSOUND - Not Positively Prepared, Justified, Effective or Consistent with National Policy and Failure in Terms of Legal Compliance:

- Having reviewed the SA documents prepared by AECOM to support the Plan Bewley Homes has a significant concern regarding the overall approach taken by the Council.
- Throughout the SA document there are clear statements that the Council’s chosen development strategy is flawed and will lead to fundamental problems in terms of delivery, particularly in relation to new housing. The key concerns that Bewley Homes has are set out in the bullet points below with reference to the relevant sections of the SA documents:
  - **Impact on Economy** – The SA concludes that there will be significant negative effects on the economy as a result of the preferred option set out in the Plan on the basis that no contribution is being made towards meeting the unmet housing need within the HMA, which is also a FEMA. The SA offers no real justification for why this failing is not being addressed and instead states that the Council is awaiting the views of the Local Enterprise Partnership on the matter (Page 7 of the Non-Technical Summary to the SA refers). This represents a fundamental failure on the part of the Council to proceed with a Plan that has not addressed this key matter and where feedback is still outstanding from a key stakeholder.
  - **Housing Delivery** – The SA documents identify in numerous locations that the Council’s preferred option does not deal with the need for delivery in the early years of the plan period and that ‘question marks’ exist. The suggested approach to dealing with these ‘question marks’ is to leave the matter for debate at the examination. In Bewley Homes’ view this is too little too late. The Council’s poor history in terms of delivery of housing speaks for itself and it is incumbent upon the Council to properly address the matter of delivery in the early years now and before the Plan proceeds to examination. The current approach leaves the Council open to challenge and the real likelihood of failure at the examination, which would be more harmful to the Borough than dealing the submission of the Plan to properly address the matter of housing delivery now.
  - **Duty to Cooperate** – The Council has consciously not sought to address any shortfalls in housing delivery elsewhere in the HMA, particularly in relation to Woking and Waverley. As a consequence there is a real prospect that the housing need across the HMA will not be met. It is evident from the approach that Waverley is currently taking that it will not be seeking to meet all of its OAN through the emerging Local Plan and Woking has already confirm this position. Guildford Borough although constrained does have capacity to accommodate more than its OAN and therefore to take on some of the unmet need in the HMA. This is of vital importance and is a basic legal requirement that the Council has failed to properly address as evidenced by the SA documents. Furthermore and in terms of the proposed Wisley allocation it is clear that the Council has not properly engaged with Elmbridge Borough Council to explore and address its concerns, which in the case of harm to the Green Belt are supported by the Inspector that examined the Elmbridge Local Plan.
  - **Failure to Consider Alternatives** – The SA documents refer to a series of growth options and have considered them against the required criteria. However all of the growth options are predicated on housing delivery from the same sources. In particular relation to the Green Belt no other options beyond those identified by the Council have been assessed. The Council has even removed some Green Belt sites that were considered in the previous draft of the Local Plan purely on the basis that they attracted objection.
    The failure to consider other site options, particularly in relation to potential Green Belt releases, is a significant flaw in the SA process. Although the SA states that only sites that have scored green or amber in the Green Belt review have been considered this is patently not true because Normand/Flexford is a red site.
    The evidence that Bewley Homes has provided in this representations confirms that there are locations in the red areas that are in fact suitable for release from the Green Belt and are less harmful than locations such as Wisley, Normandy/Flexford and Blackwell Farm, which because of their relatively modest scale can make a positive contribution towards the supply of both open market and affordable housing in the early years of the plan period.
    The Council’s failure to consider these alternatives has resulted in the progression of a development
strategy that is flawed and will fail to meet the development needs of the Borough, particularly in the early years of the plan period.

• The SA approach is therefore flawed and requires a complete review to ensure that as the key supporting document to the Plan it is robust and accords with the requirements of the Framework and the NPPG. The Council cannot proceed to the formal submission of the Plan on the basis of the SA in its current form and to do so would result in the document being found unsound for the reasons identified above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/694  Respondent: 11716417 / Solum Regeneration (Solum Regeneration)  Agent: Nathaniel Lichfield & Partners (Dennis Pope)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Summary

The omission of an adjustment for London is a significant flaw in both the SHMA and the addendum, leading to an under-estimate of future demographic-led need in both Guildford and the West Surrey HMA. Whilst a sensitivity was undertaken in the West Surrey SHMA, which showed an increase in need in Guildford under the London migration scenario, this was not incorporated into the SHMA's conclusions on OAHN. In the addendum, despite there being no significant change in the evidence, it is concluded that no adjustment is required. This is despite the evidence for Guildford in particular clearly showing that net migration fell significantly in the immediate aftermath of the recession, and has yet to begin recovering.

Overall the addendum has failed to sufficiently demonstrate that an adjustment for London should not be made, and in doing so has under-estimate future demographic-led housing need for Guildford (and the HMA in the SHMA).

Economic Growth

3.19 With regards to employment-led needs, there are two aspects of the relevant section of the PPG (Reference ID: 2a-018 20140306). The first relates to the scale of job growth within the HMA:

"Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area ..."

3.20 The second then relates to the issues associated with areas where there is a mismatch, and refers to the issues of unsustainable commuting patterns and the resilience of local businesses. It states:

"Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems."

3.21 In determining the overall scale of job growth the SHMA used forecasts from Cambridge Econometrics, Experian and Oxford Economics dated 2015. These sources showed growth of between 0.6% and 1.1% per annum for Guildford, averaging 0.9% per annum (amounting to 17,700 jobs in Guildford) which was applied within the assessment of need. For Guildford, this showed a need for 637 dwellings per annum.

3.22 The addendum applies an updated forecast of growth using forecasts dated 2016, which show growth of 0.7% per annum, amounting to growth of 12,893 jobs over the [new] projection period 2015-34. However, it does not present any analysis to show what the impact of this reduced mforecast of growth in Guildford is across the rest of the HMA. It may
be the case that lower growth in Guildford is simply offset by higher forecast growth in the rest of the HMA, where the other two Districts (Waking and Waverley) would need to increase their level of housing provision to account for higher levels of job growth. The risks associated with adopting this ‘pick and choose’ approach are set out in detail above in paragraphs 3.8-3.9, primarily the risk of creating unmet need as the need for more housing elsewhere in the HMA is unaccounted for.

Summary
3.23 The addendum has failed to demonstrate that lower job growth in Guildford is not countered by higher job growth elsewhere in the HMA. The most recent assessment undertaken consistently across the HMA is that within the SHMA, which demonstrated a need for 637 dwellings per annum in Guildford. If the new forecasts show lower growth in Guildford but higher growth in Waverley and Waking, the housing needs in those areas will need to be increased to balance the reduction in Guildford. For Guildford to reduce its OAN on the basis of lower job growth without considering the impact of updated forecasts across the HMA risks creating unmet need in the housing market area, reducing the resilience of local businesses or generating unsustainable commuting patterns.

Market signals
The SHMA and addendum consider a response to market signals has been adequately addressed by making an adjustment to household formation rates for 25-34 age group. However this is wholly insufficient because: - The PPG indicates that adjustments to household formation rates and for market signals are separate stages in the calculation (headship rates in ID 2a-015 and market signals in ID 2a-020); - Modelling household formation as a precise response for market signals doesn't seek to consider what impact it has on improving affordability. Market signals/affordability affects other age groups, and the PPG is clear that the purpose of a market signals uplift is to provide more than the household projections, hence it is necessary for any market signals uplift to be in excess of the figure suggested by the household projections. - Overall uplift in Guildford of 9.0% above demographic/economic-led needs is exceptionally modest in the context of the affordability pressure that exists in the District and unlikely to be a sufficient response to market signals.

Waverley Local Plan - Inspector's Initial Questions
3.25 The approach in the West Surrey SHMA (which is the same as that in the addendum) has already been considered in Waverley. The Local Plan Inspector's Matters and Issues for Examination (ID-3) (April 2017) stated; 
"... having considered the written evidence, I do not consider that the OAN adjustment to improve affordability is adequate. Focusing on household formation suppression for one age group results in a vent minor uplift and I have seen no evidence that this would improve overall affordability. The lowest quartile affordability ratio is extremely poor. In evaluating the scale of uplift required to improve affordability it is not adequate simply to benchmark against neighbouring authorities and I do not accept the argument that uplift will not improve affordability; such an approach is contrary to Planning Policy Guidance. Evidences required to demonstrate clearly a link between uplift and improved affordability".

With the approach put forward in the SHMA already in question by the Waverley Local Plan Inspector it is unlikely that the same approach in Guildford can continue to be considered adequate. As such, an alternative approach to market signals is set out below, reflecting the requirements of the PPG.

Approach to market signals - PPG
3.26 The PPG sets out a clear two-stepped process to addressing market signals within the calculation of OAN:

1 Firstly, to determine whether a market signals uplift is necessary. This is set out in PPG ID2a-019 within the first sub-paragraph as follows:
"Appropriate comparisons of indicators should be made ... A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections."

2 Secondly, when a market signals uplift is required, to identify what scale that should be set at with guidance given that it should be set at a level that could be expected to improve affordability. This is set out in PPG ID2a-019 within the second and third sub-paragraphs as follows:
"In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable ... they should increase planned supplu by an
amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability and monitor the response of the market over the plan period."

In respect of the evidence underpinning the Guildford local plan, the first step is not in dispute. The West Surrey SHMA assesses the market signals and concludes that affordability pressures in the West Surrey HMA are "significant" (page 115- key messages), with affordability pressures described as "severe" and that an upward adjustment should be applied (para 7.47). It is the second step that is in dispute, and whether the SHMA's response to this can be viewed to be one that "on reasonable assumptions ... could be expected to improve affordability". As set out above, the Waverley Local Plan Inspector has already stated that the scale of uplift put forward in the West Surrey SHMA is insufficient.

3.28 For clarity, the West Surrey SHMA's response to market signals is to adjust household formation ('headship') rates for the 25-34 year age band, so that they increase back to their 2001 levels (para 7.53), and this adjustment is applied on the employment-led scenario. This approach remains the same in the Guildford addendum, and is considered inappropriate in light of the Waverley Local Plan Inspector's initial comments and the guidance in the PPG, which is discussed in further detail below. The outcome of applying this headship rates adjustment in the SHMA in Guildford amounts to a 31 dpa uplift on the employment-led needs of 637 dpa (equivalent to an uplift of 5%) and in the addendum this amounts to a 52 dpa uplift on the employment-led needs of 579 (equivalent to an uplift of 9%).

The principle of market signals uplift to improve affordability

The purpose of a market signals uplift is to ensure the Government's housing aims (as expressed in the NPPF) are met and to ensure this is reflected in assessments of need by making "upward adjustment to planned housing numbers compared to ones based solely on household projections" (PPG ID2a-02o) where market signals indicate such an adjustment is necessary. The principle of providing 'more' than 'unvarnished' household projections in England has long been established through successive assessments of the country's problems with lack of housing supply. A literature review of these assessments is included at Appendix 1. They demonstrate, over a sustained period, a consensus over the need to increase supply above household projections to deliver improvements in housing affordability. This has continued to underpin successive Governments' approach to assessing housing need, including within the PPG and more recently as recognised within the Housing White Paper. Across these reports, the evidence would suggest that - at the national level- an uplift of between 20.9% and 44.2% above the number of homes implied by household projections alone would be necessary to deliver improvements in affordability.

Under the current planning system, achieving a national outcome for housing supply is the product of implementing a large number of individual local plans. As such it is fundamentally necessary to link any local strategies to the overarching national principles which are driving Government policy (i.e. 'think global, act local'). Each area will have its role to play in contributing towards the Government's aims; some more than others, based on their circumstances. This is explicitly acknowledged in the SHMA by GL Hearn (key messages, page 115 bullet point 3).

It is acknowledged that housing supply is but one factor influencing the affordability of housing (availability of credit and household incomes being two other key influencers), but the role of the planning system in increasing supply to achieve this is clearly an important lever available to government, and one that it seeks to apply through PPG-compliant assessments of OAN. 3.33 Whilst the above places the market signals uplift within the national context, how this overarching principle, is applied to local evidence in Guildford and West Surrey is considered below.

How do we define an improvement in affordability?

3.34 The PPG states that the ratio between lower quartile house prices and the lower quartile income or earnings can be used to measure affordability and this is the metric around which we have focused our analysis in this paper. Although the PPG (ID: 2a-02o) sets out that plan maker should "increase planned supply by an amount that ... could be expected to improve affordability", the reference case for that improvement is not stated. The PPG (ID2a-003) requires that the assessment of need "should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur." In this regard, any improvement to affordability should be one that is reasonably expected to occur.
3.35 Measuring improvements in affordability should make reference not only to current levels of affordability but also to any forecast change in affordability were housing supply to progress at a level consistent with official projections. This must be set in the context that the lower quartile affordability ratio in Guildford was 12.2 in 2016, and has been steadily worsening in recent years (see most recent data released March 2017 in Appendix 2). 3.36 The Office for Budget Responsibility (OBR) produces forecasts of both house prices and wages and analysis on the inter-relationship between the two factors2 • We present analysis later in this note (and at Appendix 3) which applies these assumptions to Guildford; this forecasts that if housing supply increased in line with the OAN for Guildford set out in the addendum (i.e. at 654 dpa over the period 2015-34), the affordability ratio would worsen to 14.4 by the end of the plan period in 2034. 3.37 On this basis, we consider that, any increase in planned supply (as required by the PPG3) should as a minimum be such as to stabilise, and preferably improve given it is above the rest of the HMA, the current affordability ratio in Guildford (12.2). Even stabilising the affordability ratio at the current level would represent a better outcome than the reference case of continued worsening affordability in the District. This is a goal that was recognised by the NHPAU in its work and by the House of Lords Select Committee on Economic Affairs4 both of which we review in Appendix 1.

An evidence based market signals uplift for Guildford and West Surrey

3.38 There are numerous methodological approaches that can be adopted in seeking to quantify an appropriate market signals uplift for Guildford based on local evidence of affordability and market signals in the District and the HMA. The PPG does not set out a single definitive approach. Indeed, it suggests (ID: 2a-020) that the approach is one where- having established that an uplift is required:


1 the adjustment should be one that is reasonable;
2 The scale of adjustment should be related to the relative scale of affordability constraints and other indicators of high demand. The greater the improvement in affordability needed, the larger should be the additional supply response; 3 Plan makers should not attempt to estimate the precise impact of an increase in housing supply; 4 They should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability; 5 They should then monitor the response of the market over the plan period.

3.39 On the most simple basis, applying the scale of uplifts identified as required to address affordability at the national level of between 20.9% and 44.2% would indicate a housing supply requirement of between 697 and 832 dpa in Guildford (based on addendum's demographic-led need of 577 dpa). Naturally, such an approach assumes other Local Plans would also make appropriate adjustments for their market signals in accordance with Government policy's 3-40 However, it is also clear that we need to look at the circumstances of Guildford in identifying an appropriate scale of uplift, given the greater problems of affordability in that district. We have therefore looked at a range of alternative approaches at the local level, and then draw these together to arrive at a conclusion as to the appropriate uplift.

1. OBR house price forecast and University of Reading model

3.41 The Office for Budget Responsibility (OBR) produced Working paper No.6 Forecasting house prices in July 20146 • The report identifies with regards to future average earnings growth and median house price growth (the components of an affordability ratio) in paragraph 3.42:

"Using some long-run assumptions for real income growth (2.2 per cent a year, including growth in the number of households of 1 per cent a year) and housing supply (keeping pace with the number of households), and assuming the housing discount rate and wage share variable are stationary, the model predicts around 3.3 per cent real house price growth a year in steady state. In addition, assuming consumer price inflation in line with the Bank of England's 2 per cent target implies 5.3 per cent a year nominal house price growth in steady state."

3.42 The University of Reading's affordability model, as set out previously, found a high price elasticity (-2.0) in relation to increases in stock at regional level in England, implying in effect that for every 1% increase in supply, relative prices would be expect to fall by 2%. 3-43 There has been some degree of economic change since July 2014. OBR's March 2017 economic outlook would indicate average house price growth of 4.80% per annum and peak average wage growth
of 3.7% per annum over the period to 2022 (the horizon of OBR's economic outlook). Although different in absolute terms to its July 2014 assumptions, the difference between wage and house price growth is the same, i.e. the affordability outcomes under the same assumed rate of housing growth will be the same whether using OBR's July 2014 or March 2017 assumptions.

Evidence later in this document (and at Appendix 3) suggests this is now taking place across many SHMAs. Working paper No.6: Forecasting house prices (July 2014) Office for Budgetary Responsibility, Toby Auterson- http://l ltdgetresponsibility.org.uk/docs/dlm uploads/ WPo6-final-V2.pdf

3.44 Based on the above reports, the District would need to deliver 873 dpa on average over the period 2015-34 to maintain affordability at its current level (12.2) to 2022 (the horizon of OBR's economic forecast), or 987 dpa to maintain affordability at its current level to 2034 (the end of the plan period). This should be seen in the context that affordability within the projection period has already worsened, from 10.9 in 2015 to 12.2 in 2016. Evidently to return affordability to the level seen at the start of the plan period and even greater uplift would be needed. Lichfields' analysis shows that 1,224 dpa would be needed to bring affordability back to the 2015 level by 2034. 3.45 Even then, it should be noted the above modelling assumes a price elasticity of -2.0 which could be seen as cautious. Recent research by generis indicates that at a Local Authority level a price elasticity of -1.0 is more appropriate (1% increase in supply brings about 1% fall in price) and better reflects factors at the local authority level (paras 4.19-4.22). However, this would involve taking a different view to the OBR position.

2. Guildford weighted apportionment of national needs

3.46 Guildford is relatively worse in respect of affordability than the national equivalent, with a lower quartile affordability ratio of 12.2 compared with 7.2 nationally. All other things being equal, to improve affordability across the country, Guildford, and its housing market area peers, would need to make a proportionately greater uplift than those where affordability issues are less acute. If we accept the national position set out above - that the minimum national level of delivery required is c.250,000 dpa (e.g. as in the July 2016 House of Lords Select Committee report - see paragraph 81) - then this would imply a 35,000 dwelling uplift above the 2012-based and 2014-based household projections (both at c.215k dpa). We can then consider how this required uplift should be shared between 320+ Local Planning Authorities across the country in order to seek to hold the affordability ratio (at least at a national level) constant. In doing so, we broadly adopt a localised version of the approach adopted by the NHPAU as summarised in Appendix 1.

[7 Why supply matters: the elasticity of house prices at a local level (January 2016) Regeneris Consultinghttps://drive.google.com/file/d/oB3JZDh2pahPaVnco2dUg2Tk0/view]

Figure 1

3.47 We have modelled three alternative scenarios for market signals uplifts across the country, with outcomes as follows:

1 Each district with an affordability ratio above the national ratio makes a market signals uplift in proportion to its difference with the national figure - this would see Guildford would address 0.6% or 209 dpa equivalent to a 36% uplift on the addendum demographcic need of S77 dpa;
2 Each district with an affordability ratio above the national ratio makes a market signals uplift in proportion to its difference with the national figure (weighted so%) and its projected household growth (weighted so%)- this would see Guildford address 134 dpa, equivalent to a 23% uplift; and
3 Every district (whether above or below the national ratio) makes a market signals uplift in proportion to its difference with the lowest affordability ratio, Copeland at 2.6, (weighted so%) and its projected household growth (weighted so%)- this would see Guildford address ns dpa, equivalent to a 20% uplift.

3.48 Given a) is simply weighted by the affordability ratio, and takes no account of the baseline scale of growth anticipated in the district, it is considered that using the approach indicated at b) and c) would better reflect the scale of uplift that, when adopted in LP As across the country, could provide sufficient housing to hold the affordability ratio steady in each location. This would suggest an uplift of between 20% and 36% for Guildford.

3. Benchmarking stock increases

Guildford has historically delivered very modest growth in its stock of homes in comparison to other authorities in the South and East of England. It is notable that Guildford, with completions at around 0.48% of stock annually over the
period 2001-2016, is below the majority of other areas. Even at the proposed housing requirement, of 654 dwellings per annum, this would reflect growth of c.1.04% per annum, below what many other areas have achieved, even during a period including recession. [Figure 2]

3.50 As illustrated in Figure 2, areas including, Milton Keynes, Swindon and Dartford have all delivered new housing at a rate of up to 1.5% of stock per annum (and in some cases, more if looking at the period pre-recession), and see generally lower affordability ratios. On a comparative basis, this analysis demonstrates that, all else being equal, a greater growth rate in housing stock could help to moderate affordability pressures (albeit clearly it is not the only factor).

3.51 If Guildford were to increase rates of delivery to 1.2%-1.4% of stock per annum, as seen in numerous locations elsewhere, this would be equivalent to a delivery rate of 767-912 (against a 2016 dwelling stock of 57,640 as per CLG Live Table 125). At the lower end this represents an uplift of 33% on the addendum's demographic-led needs of 577 dpa and could be seen to be a level of stock increase which could reasonably be expected to moderate increases in affordability to levels seen in those more affordable comparator locations where housing stock has been growing at such a rate.

4. Benchmarking market signal uplifts elsewhere
As set out in Lichfields' previous review, it is considered that benchmarking Guildford against market signal uplifts applied elsewhere in the Country is a relevant and helpful indicator of the scale of market signals uplift considered reasonable against the PPG. At Appendix 3 we set out a table of where Market Signal uplifts are being applied either through current SHMAs or in Inspector's findings on Local Plans. Whilst the position is varied, it does on a general basis confirm two principles:

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Representations_letter_21.07.171.pdf (3.2 MB)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1459  Respondent: 11992097 / Karen Fryatt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

-Lack off evidence for alleged housing need numbers which are more than double the previous figure given in 2012.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4032  Respondent: 11992097 / Karen Fryatt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

-Lack off evidence for alleged housing need numbers which are more than double the previous figure given in 2012.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4021  Respondent: 12050145 / richard gunston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

-There is no evidence to support the requirement for the number of houses intended -

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4295  Respondent: 12062017 / Dandara Ltd (John Richards)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Executive Summary
These representations to the proposed submission Guildford Local Plan have been prepared by Dandara Ltd in the context of their interest in promoting the residential development of land to the west of Shere Road in West Horsley.

The housing strategy contained in the draft Local Plan is considered to be unsound due to an overreliance on large-scale, strategic housing sites which cannot deliver new homes until the middle to end of the Plan period due to associated infrastructure delivery burdens. The implication of this is that upon adoption, the Plan would not be able to reinstate a five year housing land supply due to the imbalance of small to medium scale sites able to deliver new housing in the shorter term compared with large-scale, strategic sites. This will exacerbate past rates of housing delivery shortfall, rising unaffordability and suppressed household formation rates. The main points made within the representations include:

- Guildford Borough has historically failed to meet its housing targets resulting in low levels of housing delivery, rising unaffordability and depressed rates of household formation;
- Over the first five years of the new Local Plan period, the Council expects to accrue a housing shortfall of minus 2,019 dwellings;
- In order to be considered effective and positively prepared, the new Local Plan should therefore be seeking to immediately address housing delivery shortfall experienced during the first five years of the Plan period and beyond, proactively boosting the availability and affordability of housing stock across the Borough;
- This strategy should be supplemented by a review of the SHMA to ensure that past trends of suppressed housing supply, increasing unaffordability and depressed household formation rates are being factored into the eventual objectively assessed housing need figure;
- Instead, the housing and spatial strategy of the new Local Plan disproportionately focuses on the delivery of a small number of large-scale, strategic housing allocation sites which will deliver over 50% of total objectively assessed need;
- Due to the scale of these proposed housing allocation sites, they require significant improvements to strategic infrastructure, including highways, before they can be brought forward;
- The Local Plan expects that these strategic housing allocation sites will not begin to deliver new homes until at least 2021/22 which even then is uncertain due to timescales, costs, sources of funding and viability associated with the accompanying strategic infrastructure improvements;

- This strategy, dominated by large-scale and longer-term housing sites is unable to reinstate a five year housing land supply following adoption of the Plan in direct conflict with para. 47 of the NPPF;
- The imbalance of the housing strategy is demonstrated by the Council being required to deliver in excess of 1,100 dpa towards the end of the Plan period, being significantly in excess of the 693 dpa or any observable historic completion rates;
- This disproportionate reliance on such larger-scale and longer-term housing sites fails to address historic under-supply of housing, present rates of unaffordability and absence of a five year housing land supply meaning that the Plan cannot be considered justified as the most appropriate strategy when considered against reasonable alternatives;
- The evidence base underpinning the housing strategy comprises a Green Belt and Countryside Study which includes a range of Potential Development Areas (PDAs) in which development could be located without undermining the five principal purposes of the Guildford Green Belt;
- These PDAs include smaller and medium scale sites, such as land off Shere Road in West Horsley, which would be able to deliver housing in the shorter term to allow Guildford to reinstate a five year housing land supply and to immediately start addressing historic under-delivery and unaffordability;
- The Council has failed to adequately assess the full role that PDAs could play in delivering much needed short term housing supply by incorrectly and selectively applying a Green Belt sensitivity map as a finite constraint for certain sites located within wider, ‘high sensitivity’ parcels;
- This ‘macro scale’ Green Belt sensitivity map should not have been used by the Council to justify not assessing previously identified PDAs which were subject to much more robust, site specific assessment at a ‘micro scale’ which confirmed that their development would not undermine the Green Belt purposes of the wider parcel;
- Land to the west of Shere Road is one such PDA which is self-contained, visually and separately distinct from the wider ‘high sensitivity’ parcel and surrounded by existing urban influences such as the main A246 Epsom Road and housing;
- Land to the west of Shere Road was also assessed within the GBCS as being highly sustainable, the second most sustainable site in the Horsleys;
• By incorrectly applying the ‘macro scale’ Green Belt sensitivity map as a finite constraint for some sites and not others, for example Normandy / Flexford is located in a high sensitivity Green Belt parcel but is proposed for allocation for 1,100 new homes, the Council has developed an unsound housing strategy, unable to deliver sufficient housing over the early part of the Plan period;

• The Sustainability Appraisal recommends that the Council carefully considers options which could deliver in excess of OAN by up to 30% and has yet to test a scenario whereby PDAs surrounding existing villages deliver a higher quantum of new homes;

• By reassessing the potential for PDAs to deliver additional housing, the Council may also be able to consider whether they could assist neighbouring Authorities, particularly Woking Borough and the GLA, in delivering unmet need.

Introduction

These representations are submitted by Dandara Ltd in respect of the proposed submission version Guildford Borough Local Plan dated June. Dandara Ltd are promoting land located to the west of Shere Road, south of the A246 Epsom Road and east of Wix Hill in West Horsley for residential development. The site measures circa 3.7 ha and comprises two field parcels which are currently used for grazing under licence. A red line site location plan is included alongside these representations and is reproduced in Figure 1 below.

The majority of the site was identified as a Potential Development Area (PDA) within the Guildford Green Belt and Countryside Study (GBCS) under site reference E4-B and provided with an indicative capacity of 56 new. The site was also included within the Guildford Borough Land Availability Assessment 2016 (LAA) and provided with site ID 2025. An extract of the GBCS showing the identification of the majority of the site as a PDA is reproduced in Figure 2 below.

These representations will demonstrate that the current proposed submission draft of the Guildford Borough Local Plan is unsound having regard to the four tests set out at 182 of the National Planning Policy Framework (NPPF). It will be demonstrated that the Plan could be made sound if the Council robustly assessed the development potential of all PDAs identified in the GBCS. This would then allow the Council to increase their supply of housing within the earlier part of the Plan period, making up for past housing delivery shortfalls, using small and medium sized sites which are available and not considered to contribute to the five principal purposes of the Guildford Green Belt.

Dandara Ltd are one of the largest independently owned developers in the country and specialise in delivering high quality new homes which are inspired by their context and seamlessly integrate into the local. Dandara only promotes sites where the intention is to deliver new homes as soon as possible. If allocated for residential development associated with the adoption of a future Local Plan, Dandara Ltd would look to prepare an immediate planning application with the delivery of new homes within 1-2 years of planning permission being granted.

In addition to making representations to the content of the proposed submission Guildford Local Plan, we will also comment where relevant on the following evidence base documents that have been prepared in support of the Plan:

- Guildford Green Belt and Countryside Study (various);
- Local Plan Sustainability Appraisal (2016);
- Land Availability Assessment (2016);
- West Surrey Strategic Housing Market Assessment (2015);
- Housing Implementation Strategy 2014;
- Various Topic Papers including Housing Delivery; Duty to Cooperate and Green Belt and the Countryside (2016).

Plan Preparation

Paragraph 151 of the National Planning Policy Framework (NPPF) requires Local Plans to be consistent with the principles and policies set out in the NPPF including the presumption in favour of sustainable development. Paragraph 14 of the NPPF sets out how the presumption in favour of sustainable development should inform Plan making by positively seeking opportunities to meet the development needs of the Plan area and meet objectively assessed needs unless the adverse
impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole.

Paragraph 152 draws this advice together by stating “Local Planning Authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three”. Importantly, policies in Local Plans should seek to deliver the homes and jobs needed in the particular area and plan positively for the development and infrastructure the area requires to meet the objectives, principles and policies of the

Paragraph 182 of the NPPF then goes on to explain that when the Local Plan is subject to Examination, the Inspector will consider whether it is found ‘sound’, assessing the following:

1. **Positively Prepared** – the Plan is based on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring Authorities where it is reasonable to do so and consistent with achieving sustainable development;
2. **Justified** – the Plan should be the most appropriate strategy when considered against reasonable alternatives;
3. **Effective** – the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic policies;
4. **Consistent with National Policy** – the Plan should enable the delivery of sustainable development in accordance with policies in the

**Site Description**

Land to the west of Shere Road, West Horsley measures circa 7 ha and is bounded by Epsom Road to the north, Shere Road to the east, Wix Hill to the west and existing housing to the south. The site was previously promoted to the Council under their LAA ‘call for sites’ for residential development comprising circa 56 new homes. A red line site location plan is reproduced below:

The site is located within the Green Belt and immediately to the south of the existing settlement boundary for West The site is surrounded by existing urban influences including the A246 Epsom Road and housing on Wix Hill, Shere Road and a private road immediately to the south. The site does not fall within the Surrey Hills AONB which is located further to the south, with no visual interconnectivity due to intervening residential properties on Shere Road and Jefferies Road. The site does form part of the much wider Surrey Hills Area of Great Landscape Value (AGLV). It is important to note that the site is not proposed to be included within the AONB as part of any on-going review into boundaries currently being undertaken by Natural England with specific focus on adjacent AGLV areas.

**Green Belt Context**

The suitability of the site to accommodate residential development was originally considered in the 2013 ‘Guildford Borough Green Belt and Countryside Study’ prepared on behalf of the Council by Pegasus Planning Group. It is important to note that the Green Belt and Countryside Study did not assess the whole of the site being promoted by Dandara Ltd and excluded the smaller of the two field parcels located adjacent to Wix Hill. However, as explained in the Green Belt section of these representations and within the accompanying Technical Note prepared by specialist landscape and Green Belt consultancy Define, this smaller field parcel is considered to display identical landscape and Green Belt characteristics to the wider assessed site.

The site was identified within the Study as falling within ‘Land Parcel E4’ which was considered, as a whole, to “... provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt” (Volume 1, 20). In specific reference to site ‘E4-B’, the Study described it on pg. 125 as being “… surrounded by defensible boundaries including hedgerows and treecover following the A246 Epsom Road to the north, hedgerows bordering Shere Road to the east, rising topography and hedgerows bordering residential properties at Wix Hill to the south and west of the PDA”. The Study then assesses nine environmental capacity criteria which are reproduced below:

**Land Use** - The PDA is currently used for arable farmland;
**Topography** - The PDAs are located on the lower slopes of the rising escarpment of the North Downs at White Hill. The PDAs are located on slightly sloping topography from the south to north, between approximately 85 and 90 metres AOD.

**Landscape Character** - The PDA comprises of two pastoral and arable fields located on sloping ground between residential properties on Wix Hill, Shere Road and the A246 Epsom Road. The fields are enclosed by moderate treebelts between the PDA and playing fields to the east, with residential gardens following Shere Road to the south and west of the PDA. Urban influences are generally provided by residential properties on Shere Road to the east and Will Hill to the west of the PDA.

**Landscape Value** - The PDAs are located within the Surrey Hills AGLV and approximately 0.2km to the north of the AONB.

**Nature Conservation** - The PDAs are not subject to any statutory or non-statutory nature conservation designations (n.b. SANGS provided at Long Reach Farm and Bens Wood, West Horsley).

**Cultural Heritage** - The PDAs are not subject to any statutory or non-statutory cultural heritage designations.

**Flood Risk** - The PDAs are not identified as land at risk from flooding.

**Agricultural Land Classification** - The PDAs are predominately located on Grade 3 (moderate/good) agricultural land.

**Public Rights of Way and Access** - The PDAs could potentially be accessed via Shere Road. There are no PROW crossing the PDAs.

As explained in 3.11 of the ‘Housing Delivery’ Topic Paper (2016), following the publication of the original GBCS, an additional Volume III addendum was prepared in response to a Joint Scrutiny Committee review of the evidence base. This followed concerns raised by Councillors and the public regarding the number of Green Belt sites proposed for development in the earlier draft of the Local Plan rather than specific criticisms of the GBCS methodology from statutory consultees.

One of the main outcomes of this review was the production of a Green Belt sensitivity map which included the site, as part of the wider Green Belt assessment parcel E4 as ‘high sensitivity’ Green. The production of this additional Green Belt sensitivity map is assessed in more detail in the Green Belt section of these representations.

Having regard to 541 of the LAA (2016), the site has seemingly been rejected for allocation due to “our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt”.

These representations will demonstrate that the site should have been further considered for development given its identification as a PDA within the

**Sustainability**

The site is located in an inherently sustainable location, immediately adjacent to the established settlement boundary of West It is located within short walking distance of a variety of local shops and services including a Londis convenience store and dental practice immediately opposite with an ATM, village hall, public house, playground, playing fields and church within a ten minute walk. The adjacent A246 Epsom Road is served by two principal bus routes being the 479 and 478 which provide regular services into Guildford, Epsom and Leatherhead (no. 478 serves Horsley station).

As per Figure 4 below, Horsley railway station is less than a 10 minute cycle and provides train services into Guildford in less than 15 minutes and London Waterloo in an This part of East Horsley provides additional retail facilities and social and community services including banks, cafes, restaurants, post office, hairdressers, butchers, GP surgery and pharmacy. Land to the west of Shere Road in West Horsley is therefore sustainably located to provide ease of access to a variety of shops, services and public transport modes in accordance with para. 30 of the NPPF which states that “in preparing Local Plans, Local Planning Authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport”. 
The NPPF advises at 84 that “when drawing up or reviewing Green Belt boundaries Local Planning Authorities should take account of the need to promote sustainable patterns of development”. In response, the GBCS assesses the sustainability of each identified PDA and concludes for both West and East Horsley that land to the west of Shere Road is the second most sustainable site looking both at access to social and community services and recreation facilities.

Availability

In accordance with 47 of the NPPF, land to the west of Shere Road, West Horsley is deliverable, with no known constraints to development; being available now; promoted by Dandara Ltd for residential development; offering a suitable and sustainable location for development; and being viable, allowing development to be delivered during the early part of the Plan period.

Green Belt and Countryside Study

These representations are accompanied by a Technical Note, prepared by specialist landscape and Green Belt consultancy Define, in respect of the Guildford Borough Green Belt and Countryside Study (GBCS). This Technical Note assesses in detail the Green Belt evidence base underpinning the proposed submission Local Plan, raising a number of substantive concerns regarding the methodology and particularly the latter production of a macro-scale, Green Belt sensitivity map which has been applied to land to the west of Shere Road, West Horsley as a finite constraint despite the site previously having been individually assessed and identified in the GBCS as a Potential Development Area (PDA). Furthermore, other sites proposed for allocation within the draft Plan fall within the same broad high sensitivity Green Belt designation yet are conversely deemed

Parcel Assessment

Volume I of the GBCS explains how Guildford Borough was divided into various assessment parcels which were then tested to understand how each parcel serves the purposes of the Green Belt Para 1.6 expands upon this methodology by stating that “following the identification of parcels of land, such parcels were scored based upon their current adherence or otherwise to the purposes of the Green Belt. In particular, this included the ability to check the unrestricted sprawl of large built up areas, the prevention of neighbouring towns from merging into one another, assistance in safeguarding the countryside from encroachment, and the preservation of the setting and special character of historic towns”.

Land to the west of Shere Road in West Horsley is located within Parcel E4 for assessment purposes within the The Study concludes, having assessed the parcel against the five Green Belt purpose tests included at para. 80 of the NPPF, that “land parcels D6, E4 and E5 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt”. In order to understand which parts of the wider land parcels are potentially suitable for development without significantly compromising the purposes of the Green Belt, the GBCS goes on to identify individual Potential Development Areas (PDAs) within each wider land parcel.

Para. 1.23 explains that “the Study has demonstrated that there are a number of areas which provide opportunities to appropriately accommodate development within the surroundings of certain villages across the Borough”. The majority of the land falling to the west of Shere Road in West Horsley being promoted for residential development by Dandara Ltd was identified as PDA ‘E4-B’. The full entry for parcel E4 and PDA E4-B is reproduced below, taken from pg. 20 of Volume I of the GBCS.

The GBCS therefore considered the developability of land in the Green Belt based upon the following four principal stages:

**Stage One** - Sub-division of the Borough into separate land parcels;

**Stage Two** - Assessing the degree to which each land parcel contributes to the five principal purposes of the Green Belt established within para. 80 of the NPPF;

**Stage Three** – Following the identification of PDAs within those parcels considered to provide development potential without undermining the principal purposes of the Green Belt, each of the PDAs were assessed from a sustainability perspective including ease of access to shops, services and social and community facilities;
Stage Four - Assessing the environmental capacity of the land parcels to accommodate appropriate development.

Sustainability and Environmental Capacity

Volume V, Appendix XIV of the GBCS considers the sustainability credentials of each PDA based upon a variety of indicators including distance to shops, services and sustainable transport. The assessment is split into two, the first part looking at the proximity of everyday services and the second part looking at the proximity of recreation facilities. Each PDA is given a score depending upon the distance to each named facility, which are then totalled to give an overall placing out of 44 PDAs.

In respect of accessibility to a range of shops, services and public transport modes, land to the west of Shere Road, West Horsley (PDA E4-B) is provided a sustainability score of 25 which places the site 18th most sustainable out of the 44, thus falling within the top 40%. The second part of the assessment, considering accessibility to recreation facilities, gives the site a sustainability score of 9 with equates to an average of 2.25 for each indicator, placing the site as the joint second most sustainable in respect of access to recreation facilities amongst all 44 PDAs.

Looking at the comparative sustainability of all West Horsley and East Horsley (North and South) PDAs, of which there are a total of seven, land to the west of Shere Road (PDA E4-B) is considered to be the second most sustainable in respect of access to shops, services and sustainable transport modes, with a total score of 25. Looking at access to recreation facilities, land to the west of Shere Road (PDA E4-B) similarly performs second best, with a total score of 9 (n.b. the next most sustainable site only has a score of 5).

The site was then subject to Environmental Capacity Analysis within Volume 3 of the GBCS. The PDA parcel ‘E4-B’ was assessed on pg. 125 as being “… surrounded by defensible boundaries including hedgerows and tree cover following the A246 Epsom Road to the north, hedgerows bordering Shere Road to the east, rising topography and hedgerows bordering residential properties at Wix Hill to the south and west of the PDA”. The Study then assesses nine environmental capacity criteria which are reproduced below:

Land Use - The PDA is currently used for arable farmland;

Topography - The PDA is located on the lower slopes of the rising escarpment of the North Downs at White Hill. The PDA is located on slightly sloping topography from the south to north, between approximately 85 and 90 metres AOD.

Landscape Character - The PDA comprises of two pastoral and arable fields located on sloping ground between residential properties on Wix Hill, Shere Road and the A246 Epsom Road. The fields are enclosed by moderate treebelts between the PDA and playing fields to the east, with residential gardens following Shere Road to the south and west of the PDA. Urban influences are generally provided by residential properties on Shere Road to the east and Will Hill to the west of the PDA.

Landscape Value - The PDA is located within the Surrey Hills AGLV and approximately 0.2km to the north of the AONB.

Nature Conservation - The PDA is not subject to any statutory or non-statutory nature conservation designations.

Cultural Heritage - The PDA is not subject to any statutory or non-statutory cultural heritage designations.

Flood Risk - The PDA is not identified as land at risk from flooding.

Agricultural Land Classification - The PDA is predominately located on Grade 3 (moderate/good) agricultural land.

Public Rights of Way and Access - The PDA could potentially be accessed via Shere Road. There are no PROW crossing the PDA.

Addendums
When the Council consulted on their previous 2014 draft Local Plan, land to the west of Shere Road was identified as falling within parcel E4 which was considered to have development potential, latterly refined to include the majority of Dandara Ltd’s site as PDA E4-B. Furthermore, the site was considered to be amongst the most sustainable surrounding existing villages across the Borough and subject to no known The clear recommendation made by the GBCS was that the Council should give serious consideration to the development potential of the site as PDA E4-B.

However, 3.6 of the ‘Green Belt and Countryside’ Topic Paper explains that some additional work was undertaken to the GBCS evidence base “… arising from a resolution made at an extraordinary meeting of the Council on 13th January 2014 which resulted in a special Local Plan Scrutiny Forum, held on 4th March. The enabled the community to share their further views on the evidence base and raise issues concerning methodology and fact”.

Para. 4.18 of the ‘Housing Delivery’ Topic Paper (2016) attempts to explain this additional work in more detail:

“The draft Local Plan (2014) treated all PDAs as reasonable options for development regardless of the extent to which the land parcel within which it sits scored against Green Belt purposes (as shown on the sensitivity map). However, following the feedback from consultation and the new evidence available, we have reconsidered how Green Belt is used as a constraint. The Proposed Submission Local Plan seeks to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value. In giving greater weight to the sensitivity of the Green Belt, we are have therefore sought to ameliorate the consequent impacts on the Green Belt as much as is reasonably possible”.

The production of this latter evidence base identifies the entirety of parcel E4 as falling within ‘high sensitivity’ Green Belt. The LAA then seemingly uses the application of this additional evidence base addendum to justify not only the exclusion of PDA E4-B from the proposed submission Local Plan, but also to justify not considering the site for development in any further detail despite the clear recommendation of the original GBCS and the identification of the land as a PDA. These representations raise the following serious concerns regarding the methodology of the composite GBCS, expanded upon in the accompanying Technical Note prepared by Define:

(i) Inconsistencies of Methodology

As explained above, the original GBCS divided the Borough into a series of ‘macro-scale’ Green Belt assessment parcels which were then subject to the five NPPF Green Belt purpose tests to establish their development potential. Whilst the majority of parcel E4, due largely to much of the land to the south falling within the Surrey Hills AONB, was not considered suitable for development, it was recognised that the far north-east corner displayed characteristics of self-containment that justified its identification as PDA E4-B. The GBCS has therefore justifiably started the assessment of each parcel from a ‘macro-scale’, applying the five Green Belt purpose tests set out in the NPPF, prior to then identifying PDAs at a site-specific, ‘micro-scale’ which should be considered further for

The justification of the Council provided in 4.18 of the ‘Housing Delivery’ Topic Paper that “… in relative terms, more harm is caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value”, is unjustified and unsound. This is principally because, as recognised in Volume IV of the GBCS, the parcelisation process is not based on ‘quality’ of the Green Belt but defensible boundaries such as roads, railway lines and land forms. On this basis, it is obvious that any parcel, regardless of its overall sensitivity, could contain sites which contribute little to the main Green Belt purposes of the wider parcel.

As recognised by the original GBCS which identified land to the west of Shere Road, West Horsley as a PDA, the site-specific features are wholly different from the typical performance of the wider Green Belt parcel in which the site is located (E4) in regard to its sensitivity to the Green Belt purpose The majority of this wider parcel is open and rolling countryside, and is not adjacent, between, or wholly enclosed by urban features (housing or roads) which is evident for Dandara Ltd’s site. The site is located on rising land that is well structured by housing and vegetation, and as a result has very limited visibility from the wider landscape, a point of detailed assessment highly relevant to understanding likely Green Belt effects. The latterly commissioned ‘macro-scale’ Green Belt sensitivity map simply does not have the ability to recognise or appreciate this level of assessment detail.
It is unsound for the Council to present an evidence base which commences with a ‘macro- scale’ parcel assessment prior to then focusing on individual PDAs within certain parcels which are not considered to contribute to the five principal NPPF Green Belt purpose. To then subsequently apply a latter ‘macro-scale’ Green Belt sensitivity map which is treated as superseding the more detailed ‘micro-scale’ PDA assessments previously undertaken, is neither a robust nor defensible position. The PDA assessments comprised site-specific analysis of whether certain parts of wider parcels were developable and would have included consideration as to whether development of a particular site would have a wider adverse impact upon the parent parcel from a Green Belt purpose perspective. This approach is in direct conflicts with paras. 84 and 85 of the NPPF which advise that when defining boundaries, LPAs should inter alia ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development, and not include land which it is unnecessary to keep permanently open.

(ii) Absence of Assessment

Despite the identification of land to the west of Shere Road, West Horsley as a PDA within the GBCS, with the recommendation that the Council should give serious consideration to the development potential of each PDA in more detail, the Council has used the latter application of the Green Belt sensitivity map to seemingly exclude the site from the proposed submission Local. Whilst the Council have commissioned a latter Green Belt sensitivity map which places parcel E4 within high sensitivity Green Belt, the Authority has made no effort, unlike the original GBCS, to assess the site further to understand the contribution it makes to the characteristics of the wider parcel that make it ‘high sensitivity’.

Due to poor Plan preparation, one of the most sustainable sites in the Horsleys which is not considered to contribute to the five Green Belt purpose tests as identified within an independent, professionally produced Study has been excluded from consideration due to a line drawn on a map. As demonstrated in the attached Technical Note and expanded upon above, if the Council had undertaken this work, they would have concluded that land to the west of Shere Road shares none of the high sensitivity characteristics of the wider parcel, applying the NPPF Green Belt purpose tests.

(iii) Inconsistency of Application

The Council has also not been consistent in how the Green Belt sensitivity mapping has informed their decision. Whilst they have used the fact that land to the west of Shere Road, West Horsley now falls within high sensitivity Green Belt as the only reason to justify its exclusion as a potential allocation site, land at Normandy / Flexford (Policy A46) was only ever partially identified as a PDA; has latterly been identified as falling within high sensitivity Green Belt; but has subsequently been proposed for allocation in the proposed submission Local Plan for 1,100 new homes.

Furthermore, this proposed housing allocation occupies almost the entire extent of Green Belt parcel H12, which is all of high sensitivity. This ‘high sensitivity’ Green Belt classification therefore applies to the entirety of this housing site as being of high sensitivity to Green Belt purposes, and it cannot be accurately claimed (as it can for land to the west of Shere Road and Green Belt parcel E4) that the difference in scale and performance of the wider Green Belt parcel and the site itself has distorted the site’s Green Belt sensitivity and subsequent judgement of its development credentials. As can be seen from Figure 6 reproduced below, the Council is proposing housing allocations in a number of parcels of Green Belt identified as being of high sensitivity (parcels H12, K2 and K9), yet has used the same designation as justification for the rejection of land to the west of Shere Road despite it previously being identified as a PDA.

Draft Allocation Sites

These representations will go on to demonstrate that the Council should revisit previously identified PDAs in order to deliver a more balanced housing strategy capable of reinstating a five year housing land supply following adoption of the Plan. This would achieve a more certain, balanced and equitable spread of housing delivery across the Borough which reduces the current over-reliance on the delivery of large-scale, strategic sites with significant infrastructure burdens. There are also significant landscape and Green Belt benefits to be delivered from reducing the scale of existing proposed allocations alongside increasing the number of smaller and medium scale sites deliverable over the Plan period:

**Former Wisley Airfield** – Whilst it is acknowledged that part of the site is located on previously developed land, the scale of development proposed at 2,100 new homes will represent a significant incursion into the Guildford Green Belt. Development of this scale will represent both significant encroachment into open countryside and the perception of urban...
sprawl into an otherwise largely undeveloped, rural part of the Borough. Given the isolation of the proposed allocation, it is recognised that future residents would rely on the use of the private car and regular bus services to access places of employment and higher order centres. This will generate significant movement within a much wider part of the Guildford Green Belt, undermining its rurality and increasing the sense of urbanisation. Furthermore, the scale of the proposed development bears no relationship to the settlement pattern in this part of Guildford which comprises small to medium scale villages and hamlets. The number of new homes proposed will also result in significant pressure upon the existing highway network, immediately adjacent SPA, local infrastructure and nearby habitats. The development, given its scale, will also be visible from the Surrey Hills AONB to the south which has not been taken into adequate consideration during the Plan making process. It is difficult to understand how the allocation of Wisley Airfield accords with the advice in para. 84 of the NPPF that “when drawing up or reviewing Green Belt boundaries, Local Planning Authorities should take account of the need to promote sustainable patterns of development.”

Normandy and Flexford – The Council is proposing to allocate 1,100 new homes in-between the two rural villages of Normandy and Flexford. This part of the Borough comprises Green Belt considered to be of high sensitivity, with development of this scale fundamentally undermining the NPPF Green Belt purposes of protecting the countryside from encroachment, preventing the coalescence of settlements and preventing urban sprawl.

Development of this scale would represent a significant incursion into high sensitivity Green Belt and the urbanisation of an otherwise rural part of the Borough providing relief from the built up character of Guildford, Ash, Tongham and Aldershot and in conflict with para. 84 of the NPPF. It is of particular concern that the allocation is, as confirmed at para. 4.133 of the ‘Housing Delivery’ Topic Paper, to accommodate a secondary school which would serve a catchment extending from Guildford in the east to Ash / Tongham in the west. The extent of this catchment would result in significant daily vehicular movements within the Green Belt crossing some of the most strategic parcels, separating Guildford from Aldershot, undermining its tranquillity and sense of rurality;

Land off East Lane, West Horsley – Due to the Council not giving any substantive consideration to the developability of PDAs, such as land off Shere Road, West Horsley, by virtue of it being located within wider, high sensitivity Green Belt parcels, it has resulted in sites being proposed for allocation which, looking at a site specific level, have a greater impact on the NPPF Green Belt purpose tests. For example, the proposed development of land off East Lane, West Horsley represents both urban sprawl and encroachment into open countryside which would see significant development crossing East Lane to the south which currently provides a clear, defensible boundary in Green Belt terms. In contrast, land to the west of Shere Road is surrounded by existing urban influences such as the A246 Epsom Road and housing and would represent coherent in-fill, rather than encroachment into open countryside.

Green Belt and Countryside Study– Conclusions

These representations have demonstrated that land to the west of Shere Road, West Horsley was identified in the Council’s own GBCS as a PDA following an assessment of the wider land parcel against the five NPPF Green Belt purpose It has been shown that the GBCS recognised that the site was self-contained, dominated by urban influences with no visual interconnectivity with the adjacent AONB. The site was also shown to be one of the most sustainable in West and East Horsley with no known landscape or physical constraints to realising development.

Dandara Ltd has commissioned a Technical Note prepared by specialist landscape and Green Belt consultancy Define which concurs with the assessment of the GBCS that the site should be considered further for development as a PDA, applying the five NPPF Green Belt purpose tests:

- Development would not distort the settlement pattern or create urban sprawl, it would resolve the land between Epsom Road and land off Shere Road / Wix Hill, and would have low effect on the Green Belt purpose of checking urban sprawl;
- Development would have a low effect on preventing towns merging, and would effectively act as infill between West Horsley and existing development off Shere Road/ Wix Hill;
- Development would result in a low effect on safeguarding the countryside from encroachment - the site does not appear as being countryside, largely due to being located between the A246 and existing properties off Shere Road / Wix It would form a boundary to countryside to the east, and its eastern boundary would need to reflect the loose character of existing properties off Wix Hill. A combination of rising topography and vegetation structure results in this land having very limited visibility from the local or wider landscape;
• Development would have negligible effects on preserving the setting and character of historic towns as it has no physical or visual relationship with West Horsley, or its Conservation Area, and;
• Promoting urban regeneration is applicable as a general principle, and is not applied on a site-by-site basis.

Despite the GBCS already undertaking a macro-scale assessment of wider land parcels followed by the site-specific, micro-scale identification of individual PDAs, the LPA commissioned the production of additional Green Belt sensitivity mapping following an extraordinary meeting of the Council on 13th January 2014 and the establishment of a Local Plan Scrutiny. This addendum work identified the entirety of parcel E4 as high sensitivity Green Belt which the Council has used to justify not undertaking any further assessment of the development potential of land to the west of Shere Road, West Horsley, despite its earlier identification as a PDA.

These representations and the accompanying Technical Note have demonstrated that the Council is unjustified in applying an additional ‘macro scale’ Green Belt sensitivity layer, when the GBCS had already considered whether wider parcels had an opportunity to accommodate development without undermining the NPPF Green Belt purpose. It is unsound for the Council to disregard this earlier evidence and the development potential of a site simply because a much later, ‘macro-scale’ sensitivity map has identified it as falling within a more sensitive wider parcel. This ‘macro-scale’ level of mapping cannot supersede much more detailed ‘micro-scale’ assessment work which identified certain PDAs in parcels which, perhaps being more sensitive overall than others, can nevertheless better accommodate development so as not to undermine the role of the wider parcel in Green Belt terms.

The Council has acted unsoundly in failing to consider the developability of sites identified as PDAs in the GBCS, this being their own evidence base, and recommended for further Instead, the Council has rejected certain sites on the basis of falling within a latter, ‘macro scale’ higher sensitivity parcel despite other proposed allocations, such as Normandy / Flexford, not only being located within a similar higher sensitivity parcel, but with the scale of development proposed covering a significant proportion of that parcel. This approach is inconsistent with paras. 84 and 85 of the NPPF, unevinced and in order to be found sound, the Council must revisit those sites previously identified as PDAs in the GBCS to consider whether they could deliver housing in the short to medium term to allow the Council to reinstate a five year housing land supply and establish a more balanced housing strategy over the entirety of the Plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Land off Shere Road Site Location Plan.pdf (282 KB)
- GBCS Technical Note (Shere Road - West Horsley).pdf (1.1 MB)
- Representations to Proposed Submission Guildford Local Plan (July 2016).pdf (1.7 MB)
- GB Sensitivity Map (Shere Road - West Horsley).pdf (4.5 MB)

Comment ID: PSLPA16/4296  Respondent: 12062017 / Dandara Ltd (John Richards)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Five Year Housing Land Supply

Paragraph 47 of the NPPF states that Local Authorities should “identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the Plan period) to ensure choice and competition in the market for land”. The PPG advises that “the examination of Local Plans is intended to ensure that up-to-date housing requirements and the deliverability of sites to meet a five year supply will have been thoroughly considered and examined prior to adoption …” (Para. 033, Ref ID: 3-033-20150327).

The Plan period runs for 20 years from 2013-33. The Council is therefore required to deliver 693 x 20 = 13,860 units based on the current objectively assessed need (OAN) of 693 dpa minus any Duty to Cooperate.
Five Year Housing Land Supply– Accumulated Shortfall

Over the first three years of the Plan period, 4.174 of the ‘Housing Delivery’ Topic Paper (2016) confirms that the Council delivered the following:

2013/14 = 136 (-557 shortfall)
2014/15 = 249 (-444 shortfall)
2015/16 = 343 (-350 shortfall)

Total = -1,351 (2013-16)

Over the first three years of the Plan period, there was a shortfall in housing completions of -1,351. The housing trajectory included on pg. 20 of the LAA suggests that during the first five years leading up to the adoption of the new Local Plan, 2013-18, the shortfall in housing delivery will have increased further to – 2,109. The PPG is clear that “Local Planning Authorities should aim to deal with any undersupply within the first five years of the Plan period where possible (i.e. Sedgefield methodology). Where this cannot be met in the first five years, Local Planning Authorities will need to work with neighbouring authorities under the Duty to Cooperate” (para. 035, ref ID: 3-035-20140306).

To accord with the guidance set out in the PPG, the – 2,019 unit shortfall accrued over the first five years of the Plan period should be added to the five year housing land supply requirement of 3,465 units (693 x 5) to give a housing requirement over the period 2018/23 following adoption of the Plan of 5,484 (1,097 dpa). This will ensure that the Plan is positively prepared in order to ensure a five year housing land supply is reinstated following adoption of the

Five Year Housing Land Supply– Applying Buffer

The NPPF states at 47 that to boost significantly the supply of housing Local Authorities should “… identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the Plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, Local Planning Authorities should increase the buffer to 20% (moved forward from later in the Plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land”.

The Council acknowledge at 4.169 of their ‘Housing Delivery’ Topic Paper that “… since 2008/09 completions have been persistently less than the original South East Plan housing number (322 homes per year) …”. Furthermore, “for the last seven years, completions have been less than 300 homes per year”. The Council has failed to meet its housing target during any of the past eight monitoring years which is considered to demonstrate categorically the “record of persistent under delivery of housing” required by para. 47 of the NPPF to justify the imposition of a 20% buffer.

As we will consider in detail elsewhere in these representations, the Council’s spatial strategy which relies on the allocation of large-scale, strategic housing allocations which require significant improvements to strategic infrastructure to allow delivery has further worsened the ability of the Authority to deliver sufficient housing to maintain a five year housing land supply.

It is therefore considered that there has been a clear record of persistent under delivery of housing which, applying para. 47 of the NPPF, would require the application of a 20% buffer to the five year housing land supply calculation, moved forward from later in the Plan. The Council has previously accepted that the application of a 20% buffer is appropriate within their October 2015 Annual Monitoring Report. The Council is therefore considered to have a five year housing land supply requirement as follows:

- 693 x 5 = 3,465 units;
- 2,019 shortfall from period 2013/18;
- Total 5 YHLS target = 3,465 + 2,019 = 5,484 plus 20% = 6,581.
Whilst the PPG advises that any accrued housing shortfall during the early part of the Plan period should be made-up as soon as possible within the first five years (Sedgefield methodology), it is expected that the Council will argue that this shortfall should be spread over the Plan period due to the extent of Green Belt coverage across Guildford Borough acting as a constraint to increasing housing delivery over the shorter term (Liverpool methodology). If the Inspector is minded to agree with this approach, the five year housing land supply calculation would be as follows:

- 693 x 5 = 3,465 units;
- 2,019 shortfall from period 2013/19;
- 2,019 shortfall divided by remaining years in Plan period of 15 = 135 dpa (rounded);
- Total 5 YHLS target = 3,465 + 675 (135 x 5) = 4,140 plus 20% = 4,968.

**Five Year Housing Land Supply– Projected Completions**

Projected housing completions are shown within the housing trajectory on 20 of the LAA. Over the five year period following adoption of the Plan, the Council considers that it is able to deliver the following new homes:

- 2018/19 = 519;
- 2019/20 = 863;
- 2020/21 = 861;
- 2021/22 = 783;
- 2022/23 = 1,031.

Total supply over the period 2016/21 = 4,057.

**Five Year Housing Land Supply– Position**

As calculated above, the Council requires the delivery of either 4,968 or 6,581 new homes over the period 2018/23 following adoption of the Plan to ensure the reinstatement of a five year housing land supply in accordance with 47 of the NPPF. However, due to the Council’s overreliance on large-scale, strategic sites with associated infrastructure delivery challenges, identified supply over the same period equates to a maximum 4,057 new homes. This results in a shortfall in housing land supply over the next five year period of either - 911 or - 2,524 depending upon whether the Sedgefield or Liverpool methodology is used to calculate past shortfall.

The proposed submission Local Plan is not currently in accordance with 47 of the NPPF as, following adoption, it would be unable to reinstate a five year housing land supply resulting in a shortfall of between – 911 or -2,524 depending upon whether the Sedgefield or Liverpool method is used to calculate past shortfall. The Local Plan therefore needs to identify additional sources of short term housing supply to ensure a five year housing land supply is able to be reinstated following adoption.

We have demonstrated elsewhere in these representations that there are alternative Green Belt sites, such as land off Shere Road in West Horsley, which are smaller in scale, able to be delivered within five years following adoption of the Plan and have been identified in the Council’s own Green Belt and Countryside Study as Potential Development Areas worthy of further consideration.

However, if, as the Council would appear to be suggesting in 4.171 of the ‘Housing Delivery’ Topic Paper, they are unable to reinstate a five year housing land supply following adoption of the Plan due to Green Belt sensitivity issues, which at the present time is the case even applying the Liverpool methodology plus 20%, then the PPG is clear that “where this cannot be met in the first five years, Local Planning Authorities will need to work with neighbouring authorities under the Duty to Cooperate”. The Council have provided no evidence to date to demonstrate that they have
sought to engage with other West Surrey HMA Authorities to discuss the possibility of them accommodating unmet need arising from Guildford during the early to middle part of the new Local Plan period in order to ensure a five year housing land supply is maintained. The emerging Plan cannot therefore be considered to satisfy the ‘positively prepared’ or ‘justified’ test of soundness as set out in para. 182 of the NPPF.

**Housing Strategy**

In order to be found sound, the emerging proposed submission Local Plan must be shown to be justified having regard to 182 of the NPPF being “… the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”. Furthermore, it must also be shown to be positively prepared, “… based on a strategy which seeks to meet objectively assessed development and infrastructure requirements”.

As we have demonstrated elsewhere in these representations, the Council has consistently failed to deliver sufficient numbers of new homes to meet the former South East Plan housing target of 322 dpa with 4.169 of the ‘Housing Delivery’ Topic Paper (2016) recognising that “for the last seven years, completions have been less than 300 homes per year”. Furthermore, housing completions over the first five years of the new Local Plan period (2013-18) are expected to be below the 693 dpa required to meet OAN resulting in a cumulative shortfall of minus 2,019 units. This pattern of consistent under-delivery of housing has resulted in a significant worsening of affordability within Guildford Borough, depressing household formation rates and resulting in an Authority where “affordability pressures in the West Surrey market are severe, with lower quartile house prices over ten times the annual income of young households” (2015 SHMA, para. 7.45).

There is strong evidence that the major pressures facing Guildford Borough surround historically depressed rates of housing delivery which have fed into an unbalanced housing market where the increasingly limited housing stock is unaffordable for the majority of existing and future The new Local Plan provides an opportunity for the Council to proactively address this historic undersupply of housing by accelerating housing completions over the early to middle part of the Plan period in direct response to acute housing need and affordability barriers. However, the housing and spatial strategy proposed by the Council is not currently able to achieve this principal policy objective.

**Housing Strategy – Reliance on Large, Strategic Sites**

As can be seen from Table 1 of the proposed submission Local Plan, the Council is proposing to allocate a number of large-scale, strategic development sites which, alongside other allocations and sources of housing supply, will allow the Council to meet its housing target of 13,860 new homes over the period 2013-33 excluding any Duty to Cooperate. These large-scale, strategic development sites will deliver circa 7,140 new homes or just over 50% of the total comprising:

- 3,940 new homes as part of urban extensions to Guildford town;
- 2,100 new homes at the former Wisley Airfield;
- 1,100 new homes as part of Normandy and Flexford village

However, as can be seen from the housing trajectory produced on 20 of the LAA, none of these large-scale, strategic sites are expected to begin delivering any new housing until at least 2021/22. There is thus an obvious discord between a Local Plan which, in line with NPPF and PPG guidance, should be looking to reinstate a five year housing land supply on adoption, especially given historic under-supply of housing and associated issues of affordability, and a housing strategy where over 50% of supply is reliant on longer term, large-scale strategic sites despite their being alternative / additional sites available. The ‘Housing Delivery’ Topic Paper explains why housing on these sites cannot come forward earlier:

**Guildford Urban Extensions** – Both Blackwell Farm and Gosden Hill Farm require significant improvements to strategic highways infrastructure to facilitate development for new homes. Gosden Hill Farm is required to deliver a new railway station at Guildford East (Merrow) in addition to a new vehicular access off the A3 which must be planned in conjunction with wider Highways England works whilst Blackwell Farm requires an access off the A31 with ongoing work requiring the potential delivery of a new Guildford West (Park Barn) railway station;

**Former Wisley Airfield** – This site also requires significant improvements to strategic highways infrastructure including upgrading of the A3; a through vehicular link between the A3 Ockham interchange and Old Lane; as well as a series of improvements to the existing highway network including the A3 / M25 junction, Ripley High Street and A3 on-slip;
Normandy / Flexford – Whilst this site, unlike the Guildford urban extensions and the former Wisley Airfield is not dependent upon A3 infrastructure timescales, the quantum of development proposed in an otherwise rural part of the Borough is reliant upon a number of strategic infrastructure improvements including a new local centre; secondary school; SANGS and highway improvements that will delay the delivery of any future housing.

Para. 4.117 of the ‘Housing Delivery’ Topic Paper acknowledges that “the Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which are linked to the necessary improvements to the A3 (with the exception of North Street and Normandy / Flexford)”. Para. 4.130 goes further and suggests that the Guildford urban extensions and Wisley Airfield, despite being shown as delivering new homes from 2021/22 in the LAA housing trajectory, will be unable to deliver new homes during the five year monitoring period following adoption of the Plan due to dependency on A3 infrastructure timescales – “the delivery of this site [Normandy / Flexford] is not dependent on A3 infrastructure timescales, and can start to deliver within the first five years following adoption of the Local Plan”.

Para. 4.5 of the ‘Transport’ Topic Paper (2016) states that “existing road and parking infrastructure is already inadequate or under pressure and would worsen with the planned development … i.e. A3 and M25 and in particular the A3/M25 junction area”. We also know from the evidence base, including para. 4.117 of the ‘Housing Delivery’ Topic Paper referred to above, that the delivery of the large-scale, strategic housing sites is explicitly linked to, and reliant upon, necessary improvements to the strategic highway network and particularly the A3.

Having regard to Appendices 3 and 4 of the ‘Transport’ Topic Paper, and taking Wisley Airfield as an example, it is evident there is significant uncertainty regarding timescales and funding associated with the delivery of strategic infrastructure improvements required to facilitate the delivery of the draft To allow the delivery of new homes on the Airfield, the following strategic transport infrastructure improvements are required associated with the A3 / M25 junction; A3 capacity; site accesses; bus network improvements; and cycle network improvements:

1. SRN3 – M25 Junction 10 / A3 Wisley Interchange ‘Road Investment Strategy’ – this is shown as being an ‘anticipated’ improvement costing £100-250 million and funded by Highways England and developer The notes suggest that development at Wisley Airfield would be required to at least fund an ‘interim’ improvement if it is to come forward ahead of the full SRN3 works;
2. SRN9 and SRN10 – Northbound and southbound slip roads at A247 Clandon Road – this is shown as being an ‘anticipated’ improvement costing £20 million in total and funded in full associated with the development of Wisley Airfield;
3. LRN7 - Interventions to address potential highway performance issues resulting from development at the former Wisley Airfield site – this is shown as being an ‘anticipated’ improvement costing £25 million and funded in full by developer contributions associated with the development of Wisley The notes suggest that the full scope and cost has yet to be determined and will be confirmed as part of any future Transport Assessment;
4. BT3 – significant bus network improvements serving the former Wisley Airfield site – this is shown as being an ‘anticipated’ improvement with the cost to be The notes make clear that “required as part of bus improvements for the site in perpetuity to meet minimum sustainability criteria”;
5. AM3 – off-site cycle network improvements serving the former Wisley Airfield site - this is shown as being an ‘anticipated’ improvement with the cost to be The notes make clear that this is “required to meet minimum sustainability criteria”.

As the Council notes in 4.117 of the ‘Housing Delivery’ Topic Paper, “the Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which is linked to necessary improvements to the A3 (with the exception of North Street and Normandy Flexford)”. This strategy is however a conscious choice by the Council who have chosen to exclude from further consideration previously identified PDAs. Having regard to the ‘Transport’ Topic Paper, informed by the ‘Guildford Borough Transport Strategy’ (2016) and the Surrey County Council ‘Strategic Highway Assessment Report’ (2016), Dandara Ltd has significant concerns regarding delivery, funding and anticipated completion rates associated with the large-scale, strategic allocation sites.

Delivery of Strategic Infrastructure

One of the key tests of soundness for the emerging Guildford Borough Local Plan as set out at 182 of the NPPF is that the policies are ‘effective’ whereby “… the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities”. Having reviewed the evidence base, the timescales associated with the delivery
of strategic transport infrastructure improvements required to support a number of the proposed large-scale, strategic housing allocations are currently unknown, as are the total costs and sources of funding.

Given the scale of strategic transport infrastructure improvements required, such as A3 / M25 junction improvements, it is imperative that the Council can satisfy a future Inspector that there is a sufficient level of certainty of delivery, funding and timescales in order to inform assumptions regarding housing delivery. The proposed submission draft Local Plan is proposing that just over 50% of total housing delivery is associated with large-scale, strategic housing allocations, many of which can only be brought forward if significant improvements to strategic transport infrastructure are delivered. It is therefore imperative that the Council can demonstrate that such improvements are deliverable and will be in place in conjunction with assumptions made regarding delivery of new homes. At present, Appendix 4 of the ‘Transport’ Topic Paper simply suggests that such improvements are ‘anticipated’ when they need to be firm commitments if the proposed housing strategy in the Local Plan is to be found sound.

Assumptions Regarding Housing and Infrastructure Delivery

Appendix 3 of the ‘Transport’ Topic Paper demonstrates the relationship between the timescales associated with the delivery of strategic transport infrastructure and the delivery of new homes on large-scale, strategic allocation The Council assume that delivery of strategic transport improvements, necessary to allow new homes to be delivered on a number of the large-scale, strategic allocation sites, will take place in parallel with the delivery of new homes. For example, works to SRN9, SNR10 and LRN7 associated with the development of Wisley Airfield are anticipated to commence 2021/22, the same year as the scheme delivers its first new homes. It is therefore imperative that the Council provides a clear evidence base that demonstrates that the strategic transport network can accommodate additional demand from large-scale sites whilst such improvement works are on-going and that there would be a commitment from the market to deliver.

At present, it is unclear the quantum of new homes that the strategic transport network can accommodate whilst the works are on-going and not An obvious example relates to the delivery of SRN9 and 10 which provide for northbound and southbound slip road accesses onto the A247 at Clandon Road for the use of future residents of the Wisley Airfield site. These works are shown in Appendix 3 as being undertaken during the period 2021/22 to 2027/28. However, by 2027/28, which is the latest date by which the works are anticipated to be completed, Wisley Airfield is projected to have delivered 650 new homes. It is therefore unclear whether the Council is able to commit to Wisley Airfield delivering 650 new homes by 2027/28 if all or a proportion of associated vehicular movements are reliant upon the delivery of SRN9 / 10, or other such strategic transport improvements, the timescale of which is currently uncertain and could be as late as 2027/28.

Viability

The PPG states that Local Plans should “… pay careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the Plan as a whole will not prejudice the viability of development” (ref. ID: 12-018-20140306).

We have demonstrated above for Wisley Airfield, as taken from the ‘Transport’ Topic Paper and of equal relevance to other proposed large-scale, strategic allocation sites, that there is a significant financial burden associated with the delivery of strategic transport improvements which are necessary to allow the development to come forward. Having regard to Appendix 4 of the Topic Paper, and excluding as yet unknown contributions towards public transport improvements, it is anticipated that Wisley Airfield would fund at least £145 million of strategic transport improvements (£100 million for SRN3; £20 million for SRN9&10; and £25 million for LRN7). Assuming Wisley Airfield delivers 2,100 new homes as per Table 1 of the proposed submission Local Plan, this would require a contribution of circa £69,000 per unit toward strategic transport improvements alone, excluding any other contributions.

In addition to financial contributions towards the delivery of strategic transport improvements, the large-scale, strategic allocations are also expected to contribute towards the delivery of inter alia the following:

- Localised retail;
- Social and community facilities;
- Primary and secondary education;
- Health facilities;
• Sport and leisure facilities;
• SANGS;
• Open Space;
• Pedestrian and cycle networks;
• Biodiversity and habitat enhancements;
• Affordable housing;
• Employment facilities

In order to ensure that the emerging Local Plan is able to satisfy the NPPF ‘effective’ test of soundness in terms of being deliverable over its period, the Council must undertake a robust and thorough viability assessment to demonstrate that the proposed allocations are able to fund the significant range of strategic and localised infrastructure and social and community service improvements which are required in order to ensure the proposed allocations can be sustainably funded.

This assessment of viability is particularly important for a site such as Wisley Airfield which not only cannot come forward without necessary improvements to strategic transport infrastructure as highlighted above but also requires the delivery of a raft of associated social and community facilities and sustainable transport improvements given its isolated location. Furthermore, given the chronic need for affordable housing identified within the SHMA and considered elsewhere in these representations, it is also important to ensure that viability considerations do not impact upon the ability of such schemes to deliver much needed affordable housing.

Projected Completions

These representations have previously raised concerns regarding housing being delivered on large-scale, strategic allocation sites immediately following the commencement, rather than substantive completion, of associated improvements to strategic transport infrastructure which is required in conjunction with new developments.

However, concerns are also raised in respect of projected housing completions shown within the housing trajectory set out on 20 of the LAA. There are two principal concerns that the Council should take into consideration:

1. Cumulative Completions – The Local Plan housing delivery strategy is structured in such a way that significant numbers of new homes are expected to be delivered in the latter part of the Plan period associated with the delivery of a small number of large-scale, strategic transport infrastructure projects. During the last five years of the Plan period, the Council is expecting to deliver between 1,136 and 1,260 housing completions per annum. Given that the Council has not delivered over 300 new homes during any year over the past decade (2006/16), it is imperative that the Authority is able to demonstrate that the housing market is able to absorb this number of completions which are significantly in excess of the OAN of 693 dpa. This unevidenced completion rate is a further indicator of the imbalance of the Council’s proposed housing strategy which is over reliant on large-scale, strategic allocations which deliver later in the Plan period compared with a more equitable spread of small, medium and large scale sites which are able to deliver a more balanced completion rate, closer to assessed OAN;

2. Total Completions – The Council project that the large-scale, strategic allocation sites are each capable of delivering up to 270-290 new homes per annum. The Council should provide evidence, based on schemes elsewhere in the south-east of a comparable scale, that such rates of delivery are achievable, given the associated infrastructure burdens accruing to the sites, and the potential for three large-scale, strategic sites being expected to deliver, and the market support, in excess of 200 new homes per annum each, simultaneously during the last five years of the Plan period (Gosden Hill, Blackwell Farm and Wisley Airfield).

Housing Strategy – Conclusions

The proposed submission Local Plan is heavily reliant on a small number of large-scale, strategic housing allocation sites to deliver their housing target. The majority of these new homes cannot be delivered until the completion of a range of strategic transport improvements, being 2021/22 at the This has resulted in a housing strategy that is unable to reinstate a five year housing land supply following the adoption of the Plan due to the later delivery of housing associated with the proposed allocation of large-scale, strategic housing sites. This is a conscious choice by the Council having chosen not to assess previously identified PDAs in any further detail.
Furthermore, and having regard to Table 1 of the proposed submission Local Plan, over 50% of the new homes to be delivered between 2018 and 2033 are contained within four large-scale strategic allocation sites (Gosden Hill Farm, Blackwell Farm, Wisley Airfield and Normandy / Flexford). These sites all rely on the delivery of strategic transport improvements which are currently uncertain in respect of delivery, timescales and There is a significant risk that the Council is proposing to adopt a housing delivery strategy which is overly reliant on large-scale, strategic sites which are fundamentally tied to the delivery of transport infrastructure which is inherently uncertain. Furthermore, the majority of these strategic transport improvements are intended to be partly or fully funded by the developments, raising significant concerns about viability.

The Council is aware from its evidence base that past records of under-delivery of housing has resulted in a depressed housing stock, causing rising unaffordability and supressed household formation rates. The priority of the emerging Local Plan, embodied within the housing strategy, should therefore be to ensure that sufficient housing is delivered during the early part of the Plan period in order to immediately address past shortfalls and accord with the requirement of 47 of the NPPF to boost significantly housing delivery. Instead, the Council is proposing a housing strategy that is unable to reinstate a five year housing land supply or positively address past housing shortfalls due to over-reliance on a small number of large-scale, strategic allocations which are unable to be delivered until at least 2021/22 due to associated and uncertain strategic transport improvements.

The Plan is not considered to meet the ‘positively prepared’, ‘justified’ or ‘effective’ tests of soundness as it does not meet objectively assessed housing need within the early part of the Plan period; is not the most appropriate strategy when considered against alternatives; and is not deliverable over the Plan Instead, the Council should consider allocating a larger number of small and medium scale sites, such as revisiting PDAs previously identified in the Green Belt and Countryside Study, in order to ensure that a sufficient quantum of homes are able to be delivered in the earlier part of the Plan period in order to reinstate a five year housing land supply and to reduce over-reliance on the delivery of complex, costly and uncertain major strategic transport improvements.

The Council suggest at 4.171 of their ‘Housing Delivery’ Topic Paper that it is not possible to meet short term housing need without developing many high sensitivity Green Belt sites. However, as is the case with land off Shere Road in West Horsley, such small to medium scale sites are available, have been identified as PDAs within the Green Belt and Countryside Study and are able to deliver new homes in the early part of the Plan period. As can be seen from Table 2 of the Sustainability Appraisal (SA) Non-Technical Summary (2016), the Council has not considered an Option which looks to increase housing delivery on Green Belt sites surrounding villages – for example, housing delivery numbers for the Horsleys remain at 445 in all eight Options – and therefore do not have the evidence base to demonstrate that earlier rates of housing delivery are not achievable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Land off Shere Road Site Location Plan.pdf (282 KB)
- GBCS Technical Note (Shere Road - West Horsley).pdf (1.1 MB)
- Representations to Proposed Submission Guildford Local Plan (July 2016).pdf (1.7 MB)
- GB Sensitivity Map (Shere Road - West Horsley).pdf (4.5 MB)

Comment ID: PSLPA16/4297  Respondent: 12062017 / Dandara Ltd (John Richards)  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Meeting Full Housing Need

Paragraph 47 of the NPPF requires Local Authorities to ensure that their Local Plan “… meets the full, objectively assessed needs for market and affordable housing in the housing market area … ” as far as is consistent with the policies included in the There are two specific points to consider in paragraph 47 – (i) the NPPF does not simply require Local
Authorities to meet objectively assessed housing need but crucially, full objectively assessed housing need, and (ii) the Local Authority should seek to meet full objectively assessed need for both market and affordable housing.

In order for the proposed submission version Local Plan to be in accordance with the NPPF, it must therefore include a housing target that is able to meet the District’s full, objectively assessed need for both market and affordable housing.

Establishing Full, Objectively Assessed Housing Need

In order to establish the full, objectively assessed need for market and affordable housing in Guildford Borough, the Council commissioned GL Hearn, working alongside other Authorities falling within the West Surrey Housing Market Area (HMA), who published their ‘West Surrey Strategic Housing Market Assessment’ in April 2014 (SHMA).

10.37 of the SHMA concludes that the overall need for housing in Guildford Borough over the period 2013-33 equates to 693 dwellings per annum (dpa) being a total of 13,860 new homes over the Plan period. The SHMA concludes that as a whole, the West Surrey HMA, which also includes Waverley and Woking Councils, has a total housing need of 1,729 dpa being a total of 34,580 new homes over the Plan period.

Dandara Ltd recognises that Guildford Borough Council has used the conclusions of the SHMA that the Borough requires a total of 13,860 new homes over the Plan period to inform their housing target contained in Policy S2 of the proposed submission draft Local Plan. However, it is considered that there are various aspects of the methodology underpinning the conclusions of the SHMA that warrant further assessment.

In accordance with the PPG, the SHMA uses household projections published by the DCLG as a starting point for estimating future housing need in Guildford and across the HMA (para. 015, ref ID: 2a-015-20140306). The 2012-based DCLG household projections published in February 2015 are considered to be the most up-to-date and are those referred to within the However, the PPG goes on to make three important points with respect to the use of household projections published by the DCLG:

1. The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing (para. 015, ref ID: 2a-015-20140306);
2. Plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates (para. 017, ref ID: 2a-017-20140306);
3. The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings including house prices, rates of development and affordability (para. 019, ref ID: 2a-019-20140306).

These representations will go on to demonstrate that there are various factors underpinning the evidence base that suggest that Guildford Borough Council should consider increasing their housing target in accordance with guidance set out in the NPPF and

Demographic Projections

The SHMA clearly demonstrates that there has been slow growth in the available housing stock within the West Surrey. As an example, para. 3.6 states that between 2001 and 2011, the total housing stock within the West Surrey HMA increased by 6.2% which is less than growth observed across both England as a whole (8.3%) and the South East region (8.9%). This comparatively slow increase in the housing stock is most observable within Guildford Borough which experienced only 5% growth over this period. The SHMA concludes that “this is despite indicators of above average demand, and is likely to reflect development constraints”.

The suggestion in the SHMA that the slow observable rates of housing growth across the HMA, and in Guildford in particular, is as a result of development constraints rather than lack of demand is supported by having regard to historic housing completions. 4.169 of the ‘Housing Delivery’ Topic Paper (2016) states that “… since 2008/09 completions have
been persistently less than the original South East Plan housing number (322 homes per year ... for the last seven years, completions have been less than 300 homes per year”.

What is observable across the HMA but focused on Guildford in particular, is a repeating pattern of low rates of housing delivery set within a context of high demand. This suppression of availability of stock has resulted in Guildford Borough having the second highest median house prices in Surrey / Hants at £320,000 as shown in Table 1 of the SHMA with the average price of a home in parts of Guildford, such as West Horsley, being an untenable £850,890, as shown in Table 2 of the This represents an increase in house prices of 8% across Guildford as a whole during the period 2007/12 with an even more dramatic increase of between 12%-14% for Guildford town and villages such as West Horsley over the past four years.

In such cases, where there is demonstrable evidence of suppressed supply resulting in rising house prices and worsening affordability, the PPG is very clear that “the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing” (para. 015, ref ID: 2a-015-20140306).

The SHMA reports that the 2012 SNNP suggests that the population of West Surrey is projected to grow at a rate below that expected across both the region and the country including due to lower levels of in-migration (para. 4.11). Furthermore, historic household growth in West Surrey has been quite modest in comparison with other areas with a percentage increase expected from 2013-33 of only 17.9% compared with 21% for Surrey and 20.8% for the South-East region (para. 4.51). It is therefore important that the Council satisfies itself that, as advised by the PPG, the 2012 SNNP should not be adjusted, potentially significantly, due to a more detailed interrogation of the impact that a historic lack of supply, leading to increasing levels of unaffordability, has had upon population growth, levels of in-migration and rates of household formation in the West Surrey SHMA and especially Guildford Borough.

The SHMA recognises that the 2012 SNNP projections “show some suppression in household formation rates for people aged 25-34” (pg. 66), which is the age at which the majority of UK residents attempt to establish themselves on the housing ladder. There is a clear observable link between the inability of younger age groups to establish new households and a lack of housing supply and affordability which is unsurprising given high house The Council should give serious consideration to the ability to adjust the 2012 SNNP projection to allow for an improved rate of household formation moving forward, based upon a higher housing target delivering additional homes which improves both housing stock availability and affordability within Guildford.

As a final point on the interpretation of the 2012 SNNP, we would support the alternative population projection applied in 4.73 which follows the GLA migration model of taking a rate which is half of the difference between pre-recession migration rates and the trends feeding into the SNNP. Whilst this adjustment does see higher population growth of 14.5% across the HMA over the Plan period compared with 13.6% under the SNNP projection, it does bring the projection more in-line with long term past trends than is the case with the SNNP (para. 4.75). This adjustment ensures a closer relationship to past trends compared with the SNNP which envisages a slower level of population growth than experienced historically, in a context of an undersupply of housing at unaffordable rates.

**Affordable Housing**

Paragraph 47 of the NPPF makes it clear that Local Authorities should ensure their Local Plan meets “… the full, objectively assessed needs for market and affordable housing in the housing market area”. The PPG provides clear advice in respect of how affordable housing need should be considered in terms of Plan preparation stating, “The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led An increase in the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes” (ref. ID: 2a-029-20140306).

The SHMA demonstrates within Table 42 that there is an estimated affordable housing need in the West Surrey HMA of 1,144 dpa which equates to 455 dpa in It is however recognised that this does not demonstrate actual affordable housing need as it does not take into account factors such as the role of the private rental sector (PRS) in meeting housing need or the fact that affordable housing stock will be recycled when families or individuals move from one property to another.
The SHMA therefore goes on to look purely at affordable housing need arising from concealed and homeless households which suggests that in Guildford only 403 households require housing.

However, the recommendation of the SHMA that an uplift of only 59 dpa across the HMA would be sufficient to address affordable housing need is not considered to be in accordance with 47 of the NPPF nor advice provided in the PPG for the following reasons:

1. The SHMA excludes all those households that currently rely on the PRS for their affordable accommodation, supplemented by the Local Housing Allowance (LHA). Para.6.72 of the SHMA makes it clear that “the overall estimated number of lettings in the LHA part of the PRS can therefore be seen to be 50% of the total net need derived through the affordable housing needs analysis”. Whilst it is accepted that PRS does, and will continue to, play an important role in affordable housing provision, it does represent an inherently unstable tenure due to the continued availability of funding mechanisms such as the LHA; the role of private landlords and the tenure being available as market housing; the insecurity of the tenure if a landlord decides to re-let or sell the property; and the aspirations of people to own their own home. It is strongly recommended that the Council considers whether a larger adjustment to the housing target should be made to increase affordable housing delivery and reduce such reliance on the PRS sector. This is considered especially important in an Authority such as Guildford where lack of supply and affordability in the owner-occupied sector pushes market demand into the PRS sector which, due to finite supply, then pushes up rents and directly competes with those relying on the tenure for affordable housing;

2. Table 48 does not appear to consider affordable housing need arising from newly forming households which the Council should confirm with GL Hearn, especially in an Authority within which household formation rates have been historically suppressed;

3. Whilst the SHMA is correct in ensuring that double-counting does not take place when one affordable home is vacated to allow for occupation by an alternative household in affordable housing need, the Council should satisfy itself that this assumption allows for some flexibility where affordable housing is vacated but is not available for reoccupation due to it being unsuitable for habitation;

4. There does not appear to be an assessment regarding existing affordable housing stock and whether an increase in the housing target could deliver a more appropriate range of unit types and sizes to meet up-to-date housing needs evidence.

**Economic Growth**

The PPG advises that “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area” (ref. ID: 2a-018-20140306). The SHMA reports that for Guildford, workplace employment is anticipated to grow by between 6% and 1.1% per annum between 2013-33. To establish the change in the resident workforce required to match the forecasted number of jobs, the SHMA multiplies the commuting ratio by the amount of ‘double jobbing’ to achieve an adjustment factor. For Guildford, the increase in workforce jobs between 2013-33 of 17,738 equates to a change in the resident workforce of 15,307. The SHMA concludes that “… for the resident workforce to increase in line with the forecast number of jobs would require around 637 homes per annum to be delivered in Guildford …”.

Whilst the SHMA adopts a ‘policy off’ approach to potential future changes in commuting patterns (para. 21), it is important for the Council to consider the recommendations made in respect of the relationship between future jobs growth and future housing growth, and existing commuting patterns. Para 5.19 of the SHMA explains that “the only area to see net in-commuting is Guildford where there are about 7,800 more people working in the Local Authority area than living there (and are working)”.

This evident pattern of in-commuting reflects both the sub-regional economic role of Guildford (especially Guildford town) but also the lack of affordable market housing stock within the This level of in-commuting results in a variety of significant issues for the Borough including highway capacity (especially the A3), traffic congestion (especially Guildford town centre), air quality issues and others associated with significant daily commuting in and out of the Borough for employment. The Council should give serious consideration to whether an upward adjustment should be made to the housing target to not only ensure that the resident workforce increases in line with anticipated jobs growth,
but also that there is a proactive policy response which attempts to reduce the level of in-commuting due to an increased number of more affordable homes available for local employees.

**Market Signals**

As previously discussed, the SHMA demonstrates that average house prices across the HMA are significantly above the south-east average, with entry level house prices circa 11 or more times the typical earnings of younger. The SHMA concludes at para. 7.47 that "overall the analysis of market signals and affordable housing needs points clearly to higher affordability pressures in the HMA than in other parts of the country" (para. 7.47).

The PPG advises that "the more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be" (para. 020, ref ID: 2a-020-20140306).

The response of the SHMA to addressing some of the most unbalanced affordable market housing stock in the country, set against a background of historic under-delivery of housing, is to provide an additional 103 homes across the HMA in order to “… return household formation rates of those aged 25-34 to 2001 levels by 2033”. Whilst we consider it robust to apply household formation rates to those age groups most likely to be trying to get onto the housing ladder, it is not considered that seeking to re-establish household formation rates seen in 2001 in 25-34 year olds by 2033 is sufficiently

In Guildford, the adjustment to address some of the worst affordability in the country equates to just 31 additional dwellings per It is considered that there is a real opportunity for the Council to make a demonstrable difference to affordability by not simply trying to re-establish 2001 household formation rates observable in 25-34 year olds by the very end of the Plan period, but significantly before that.

These are households that are unable to get on the housing ladder now and given that 2033 is 17 years away, even those that are 25 years old now, will no longer be in the age group from which the target is A whole decade of Guildford residents will continue to experience unaffordability and the Council should consider whether an increase in 31 dpa is a sufficiently proactive response given the extreme nature of housing need and affordability in Guildford and the wider HMA. One response may be for the Council to consider what the associated housing target increase would be if they sought to re-establish 2001 household formation rates in 25-34 year olds by a mid-point of 2025. The ability of the Council to truly improve affordability is further compounded by the housing strategy being focused on the delivery of longer-term, strategic scale sites rather than focusing upon the delivery of small to medium scale sites which can be brought forward earlier, making an immediate impact on availability of housing stock and associated affordability.

**Establishing Full, Objectively Assessed Housing Need - Conclusions**

Dandara Ltd is supportive of the Council in seeking to meet full, objectively assessed need as established by the 2015 West Surrey However, in order to ensure that the emerging Local Plan is in full accordance with the requirement of para. 47 of the NPPF to boost significantly housing supply and meet full, objectively assessed need for market and affordable housing, it is recommended that the Council revisit certain aspects of the methodology underpinning the SHMA:

- In respect of the robustness of the 2012 SNNP and whether they require adjustment, the Council should consider in further detail the impacts that historic under-delivery of housing and worsening affordability has had on past and projected rates of population growth, in-migration (domestic and international) and household formation rates and whether these require adjustment;
- In respect of affordable housing need, the Council should consider in further detail whether continued reliance on the PRS to provide circa 50% of affordable housing need in the Borough is justified given the characteristics of the tenure and the increasing pressure placed upon existing PRS properties in Guildford from market renters given affordability issues in the owner-occupied market;
- The Council should consider whether an upward adjustment should be made to the housing target to attempt to reduce rates of in-commuting into the Borough due to a lack of affordable market housing;
- The Council should consider re-establishing 2001 household formation rates earlier in the Plan period to deliver a demonstrable improvement in affordability for the generation that is currently priced out of the housing market.
Duty to Cooperate

Paragraph 178 of the NPPF makes it clear that Local Authorities have a duty to cooperate on planning issues that cross administrative boundaries, particularly in respect of the NPPF ‘strategic priorities’ set out in paragraph 156 which include Paragraph 179 advises that “Local Planning Authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and are clearly reflected in individual Local Plans”. It then reiterates that “Joint working should enable Local Planning Authorities to work together to meet development requirements which cannot wholly be met within their own areas ...”.

The PPG recognises that the duty to cooperate is not a duty to agree but “... Local Planning Authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination”. The PPG goes on to state that Local Planning Authorities will “... need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters” (para. 001, ref ID: 9-001-20140306).

Housing Market Area

The Council commissioned GL Hearn to prepare a Strategic Housing Market Assessment which, having regard to price trends and dynamics; commuting flows; and migration patterns, concluded that “… all three primary sources clearly demonstrate significant interaction between Guildford, Waverley and Working” to a degree that “… strongly supports defining these three Authorities within the same Housing Market Area” (para. 54).

Para 4 of the Topic Paper entitled ‘Housing Delivery’ (2016) recognises that in respect of housing delivery, “… there is currently unmet need arising within our HMA from Woking Borough Council”. Whilst Waverley Borough Council is currently preparing a new Local Plan which is proposing to meet the Authority’s own objectively assessed housing need in full, Woking Borough “… has an adopted housing requirement of 292 dwellings [per annum] (2010 – 2027) against an objectively assessed need of 517 [dwellings per annum]. There is therefore a shortfall of 225 homes per year between 2013 and 2027, a total of 3,150 homes”.

The SHMA provides evidence of a particularly strong relationship between Guildford and Working Boroughs including in respect of migration where there is an annual flow of almost 1,200 persons between the two Authorities (para. 31) alongside a strong economic relationship where “the strongest commuting flow from Woking is to Guildford …” (para. 2.43). Having regard to the NPPF and PPG, there is thus a strong case to be made that Guildford should be seeking to accommodate some of the unmet housing need originating in Woking Borough given the particularly strong relationships between the two, evidenced by migration and employment flows between these two members of the West Surrey HMA. The PPG advises that “the aim is to encourage positive, continuous partnership working on issues that go beyond a single Local Planning Authority’s area” (para. 008, ref ID: 9-008-20140306).

Guildford Borough Response

The Council has prepared a Topic Paper entitled ‘Duty to Cooperate’ (2016). It recognises that the Council, alongside Waverley and Woking Boroughs, worked together to commission a SHMA in recognition of strong inter-relationships within the HMA, including housing. As previously discussed, the Topic Paper recognises that “… there is currently unmet need arising within our HMA from Working Borough Council”. In response, the three Authorities are understood to be in the process of agreeing a Statement of Common Ground on housing delivery which “… recognises that there is unmet need within the HMA and commits the three Authorities to continued future joint working to ensure that as far as possible, and subject to the policies in the NPPF, housing needs across the HMA are met in full” (para. 42).

Despite the rhetoric associated with the preparation of a Statement of Common Ground relating to unmet housing delivery within the HMA, the Topic Paper would appear to suggest that, having regard to the Councils Sustainability Appraisal (SA) and policies contained in the NPPF, the emerging Local Plan is seeking to deliver a housing figure which should be considered as the maximum without any scope to address unmet housing need arising within the The Council is clear that “… we do not consider that we can sustainably accommodate any unmet need arising from Woking …”.

Having regard to the Council’s ‘Housing Delivery’ and ‘Duty to Cooperate’ Topic Papers (2016), it is evident that the Council’s position is that the Authority is only able to accommodate the number of new homes required to meet
Guildford’s own objectively assessed housing need and that any housing numbers in excess of this, would fundamentally conflict with policies contained in the NPPF and the achievement of sustainable The Council is not therefore suggesting a review of the Local Plan following culmination of on-going work to prepare a Statement of Common Ground as their position is clear that the Borough cannot accommodate any additional homes to assist neighbouring Working Borough in meeting their housing need as this would result in fundamental conflicts with NPPF policy and the achievement of sustainable development.

Dandara Ltd does not however accept that the Council has presented robust evidence to demonstrate that the Authority is unable to accommodate any additional housing to assist Woking Borough with meeting its own unmet need for the following principal reasons:

1. **Sustainability Appraisal** – the 2016 Sustainability Appraisal (SA) tests a variety of housing delivery options ranging from meeting objectively assessed need for Guildford Borough only up to an OAN plus 34% Whilst the SA strongly recommends that the two bookend options are rejected – OAN only and OAN plus 34% - it concludes that “the mid-range options are all associated with pros and cons, and necessitate close consideration” (non-technical summary, Table 3). The Council cannot therefore use the conclusions of the SA to suggest that the Borough cannot accommodate any unmet housing need arising from Woking Borough as apart from the OAN plus 34% option, the SA concludes that all other options that deliver in excess of OAN, including OAN up to 30%, should be afforded careful and close consideration. There is no evidence that the Council has undertaken this additional assessment work in the context of the Duty to Cooperate.

2. **Green Belt** – It is recognised that the NPPF allows the Green Belt to be taken as a finite constraint when considering the levels of housing to be accommodated within an individual Local Authority area. However, as explained earlier in these representations, the Council commissioned a Green Belt and Countryside Study which in 2014, identified a number of Potential Development Areas (PDAs) within the Green Belt which were recommended for further assessment to establish their development These PDAs were identified through a robust four stage assessment process which included:
   - sub-dividing the Guildford Green Belt into individual land parcels;
   - assessing the degree to which each land parcel contributes to the purposes of the Green Belt;
   - assessing the sustainability credentials;
   - assessing the environmental capacity of the land parcels to accommodate appropriate Dandara Ltd’s site off Shere Road in West Horsley was identified as PDA E4-B but has been provided with no further detailed assessment by the Council to justify why it is not proposed for allocation for The only justification provided to date concerns the application of a latter macro scale ‘Green Belt Sensitivity’ layer which is addressed in detail earlier in these representations. The Council’s own evidence base therefore identifies a range of PDAs which have been subject to robust assessment within the independent Green Belt and Countryside Study and recommended for further These PDAs would allow the Council to consider increasing its housing delivery target to assist Woking Borough address unmet need without fundamentally conflicting with the five principal Green Belt purpose tests. The PDAs were specifically identified as being capable of accommodating development without undermining the principal objectives of the Guildford Borough Green Belt:

   “The Study intends to provide the Council with sufficient flexibility to allocate the necessary number of village PDAs and through consideration of the Green Belt purposes score, sustainability rankings and environmental constraints, allows for comparison between those PDAs that have been identified, prior to potential allocation by the Council” (para. 4.9).

**Unmet Need from London**

The Topic Paper entitled ‘Duty to Cooperate’ (2016) recognises that the recently adopted 2015 FALP is unable to meet full, objectively assessed housing need derived from the London Boroughs, with a shortfall of circa 7,000 The Topic Paper recognises that the West Surrey SHMA indicates “… increased out migration from London into Guildford with an increase of 51 dwellings per year for Guildford above the demographic projection [568 homes per annum]”. It however goes on to conclude that “… given this [51 dpa] is lower than the full OAN for Guildford of 693 homes per annum [including an uplift for economic and affordability factors], no further uplift is required in response to this” (para. 4.33).

The Council would appear to be acknowledging that there is a direct relationship between unmet housing need in London and the ability for Guildford to accommodate a proportion of this need given expected future increases in in-migration
from London to However, it is not proposed to apply an uplift to the OAN figure on the basis that the 51 dwellings per year are able to be accommodated within the already uplifted housing delivery figure of 693 dwellings per year, applying economic and affordability factors. This however fundamentally misapplies the methodology underpinning the SHMA.

The 51 dpa need arising from London is in addition to need arising from economic and affordability factors which have been taken into account when calculating the As recognised within the West Surrey SHMA, “… there is a notable level of commuting from … Guildford to London – with commuting of … 9,000” (para. 2.46). The 51 dpa does not therefore fall within an adjustment to OAN based on future job creation in Guildford Borough nor to improve affordability for existing residents but rather to assist London Authorities with addressing some modest unmet need. The Council is not proposing an uplift to OAN to reflect unmet need of 51 dpa arising from London which should be given serious consideration taking into account the strong relationship Guildford has with London in respect of out-commuting for work and future in-migration.

**Conclusion**

The NPPF and PPG are clear that when Inspectors are considering whether a Local Authority has discharged their Duty to Cooperate, they must consider whether such engagement has resulted in the delivery of effective and deliverable policies on strategic cross boundary The evidence base acknowledges that Guildford sits within an established HMA which collectively is unable to meet full, objectively assessed housing need. In addition, there is also unmet housing need originating in Greater London with which Guildford Borough has an established economic and in-migration relationship.

The Council is suggesting that despite a commitment to enter into a Statement of Common Ground intended to address unmet housing need, the Borough is unable to accommodate additional housing growth on behalf of Woking Borough or London due to finite constraints surrounding Green Belt coverage and the achievement of sustainable These representations have demonstrated that the SA does not suggest that a higher level of housing growth cannot be sustainably accommodated within the Borough, up to OAN plus 30% worthy of further assessment, whilst the Green Belt and Countryside Study identifies a variety of PDAs which do not contribute to the five main purposes of the Guildford Green Belt and are worthy of further assessment.

In respect of land off Shere Road in West Horsley which was identified as PDA E4-B, the Council has not assessed the potential of the site to accommodate development in any further detail despite evidence provided by Dandara Ltd to demonstrate the limited contribution the site makes to the Green It is therefore considered that the Council has not satisfactorily demonstrated that additional housing could not be accommodate within the Borough to address unmet need evident within the HMA and from London with both the SA and Green Belt and Countryside Study suggesting additional housing sites could be developed without fundamentally conflicting with policies contained in the NPPF.

At present, the proposed submission Local Plan is not considered to be sound as it has not been positively prepared with an absence of effective and deliverable policies to address unmet housing need within the The evidence base does not justify why a higher housing delivery figure could not be accommodated within Guildford and as the PPG advises:

“The Duty to Cooperate requires Authorities to work effectively on strategic planning matters that cross their administrative boundaries. The Duty to Cooperate is not a duty to agree and Local Planning Authorities are not obliged to accept the unmet needs of other planning authorities if they have robust evidence that this would be inconsistent with the policies set out in the National Planning Policy Framework, for example policies on Green Belt, or other environmental constraints” (para. 021, ref ID: 9-021-20140410).

**Summary and Conclusions**

These representations conclude that the proposed submission Guildford Borough Local Plan is currently unsound for the following principal reasons:

- Guildford Borough has historically failed to meet its housing targets resulting in low levels of housing delivery, rising unaffordability and depressed rates of household formation;
- Over the first five years of the new Local Plan period, the Council expects to accrue a housing shortfall of minus 2,019 dwellings; In order to be considered effective and positively prepared, the new Local Plan should therefore be seeking to immediately address housing delivery shortfall experienced during the first five years of
the Plan period and beyond, proactively boosting the availability and affordability of housing stock across the Borough; This strategy should be supplemented by a review of the SHMA to ensure that past trends of suppressed housing supply, increasing unaffordability and depressed household formation rates are being factored into the eventual objectively assessed housing need figure; Instead, the housing and spatial strategy of the new Local Plan disproportionately focuses on the delivery of a small number of large-scale, strategic housing allocation sites which will deliver over 50% of total objectively assessed need; Due to the scale of these proposed housing allocation sites, they require significant improvements to strategic infrastructure, including highways, before they can be brought forward; The Local Plan expects that these strategic housing allocation sites will not begin to deliver new homes until at least 2021/22 which even then is uncertain due to timescales, costs, sources of funding and viability associated with the accompanying strategic infrastructure improvements; This strategy, dominated by large-scale and longer-term housing sites is unable to reinstate a five year housing land supply following adoption of the Plan in direct conflict with para. 47 of the NPPF; The imbalance of the housing strategy is demonstrated by the Council being required to deliver in excess of 1,100 dpa towards the end of the Plan period, being significantly in excess of the 693 dpa or any observable historic completion rates; This disproportionate reliance on such larger-scale and longer-term housing sites fails to address historic under-supply of housing, present rates of unaffordability and absence of a five year housing land supply meaning that the Plan cannot be considered justified as the most appropriate strategy when considered against reasonable alternatives; The evidence base underpinning the housing strategy comprises a Green Belt and Countryside Study which includes a range of Potential Development Areas (PDAs) in which development could be located without undermining the five principal purposes of the Guildford Green Belt;

• These PDAs include smaller and medium scale sites, such as land off Shere Road in West Horsley, which would be able to deliver housing in the shorter term to allow Guildford to reinstate a five year housing land supply and to immediately start addressing historic under-delivery and unaffordability;
• The Council has failed to adequately assess the full role that PDAs could play in delivering much needed short-term housing supply by incorrectly and selectively applying a Green Belt sensitivity map as a finite constraint for certain sites located within wider, ‘high sensitivity’ parcels;

• This ‘macro scale’ Green Belt sensitivity map should not have been used by the Council to justify not assessing previously identified PDAs which were subject to much more robust, site specific assessment at a ‘micro scale’ which confirmed that their development would not undermine the Green Belt purposes of the wider parcel;
• Land to the west of Shere Road is one such PDA which is self-contained, visually and separately distinct from the wider ‘high sensitivity’ parcel and surrounded by existing urban influences such as the main A246 Epsom Road and housing;
• Land to the west of Shere Road was also assessed within the GBCS as being highly sustainable, the second most sustainable site in the Horsleys;
• By incorrectly applying the ‘macro scale’ Green Belt sensitivity map as a finite constraint for some sites and not others, for example Normandy / Flexford is located in a high sensitivity Green Belt parcel but is proposed for allocation for 1,100 new homes, the Council has developed an unsound housing strategy, unable to deliver sufficient housing over the early part of the Plan period;
• The Sustainability Appraisal recommends that the Council carefully considers options which could deliver in excess of OAN by up to 30% and has yet to test a scenario whereby PDAs surrounding existing villages deliver a higher quantum of new homes;
• By reassessing the potential for PDAs to deliver additional housing, the Council may also be able to consider whether they could assist neighbouring Authorities, particularly Woking Borough and the GLA, in delivering unmet need.

In order to be found sound, it is necessary for the LPA to revisit the housing strategy set out in the proposed submission draft Local Plan in order to increase the number of new homes deliverable in the earlier part of the Plan. This would ensure that the Plan is considered to be positively prepared, justified and effective by proactively addressing historic housing shortfalls as soon as possible, ensuring that a five year housing land supply is reinstated. Reducing or supplementing the focus on large-scale, strategic allocations which cannot come forward until the middle part of the Plan period due to associated infrastructure burdens would not only increase supply during the early years of the Plan, but would also allow the Council to realise a more equitable spread of development across the Borough through the allocation of smaller and medium scale sites.
As with land to the west of Shere Road, West Horsley, there are a range of previously identified, sustainable PDAs which do not contribute to the five main purposes of the Guildford Green Belt and are of a scale that would allow their delivery during the early part of the Plan. We would urge the Council to revisit their evidence base and to consider whether there are PDAs, such as Dandara’s site, which offer an opportunity to deliver much needed, short term housing without undermining any of the strategic purposes of the Guildford Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Land off Shere Road Site Location Plan.pdf (282 KB)
- GBCS Technical Note (Shere Road - West Horsley).pdf (1.1 MB)
- Representations to Proposed Submission Guildford Local Plan (July 2016).pdf (1.7 MB)
- GB Sensitivity Map (Shere Road - West Horsley).pdf (4.5 MB)

Comment ID: PSLPA16/977  Respondent: 12124385 / P Davie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re Local Plan

I write to object to Guildford Borough’s Draft Local Plan as detailed below. Please show my comments to the Planning Inspector who will decide about the Local Plan. Please also acknowledge receipt of this letter.

1. General Evidence and Policies

   1. Housing Requirement: I OBJECT to the figure of 693 houses required per annum as being too high. Guildford Borough Council will not publish any details regarding how this figure was derived or to support it. It is therefore impossible to support the sudden increase in housing plans from previous years figures of 322.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4041  Respondent: 12126209 / Ray Gross  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 local plan and am acting for the owners of a plot of land in West Horsley/Ockham. In your previous consultations we proposed the inclusion of this plot as a potential development site but it was not added. From reviewing the sites that are currently proposed, we still believe that ours has significant advantages over many of those proposed. In particular, it is on one of the main roads through the villages and so it has immediate access to the road network without the addition of additional infrastructure. It is also opposite the houses on Ockham Road North and so residents are used to this aspect as they enter the village.

I attach the original estate agent particulars and am referring to Plot 1 which is 7.85acres in size (approximately 3 hectares). We would ask that you reconsider this plot with a view to including it in the Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPA16/4538  Respondent: 12136289 / Martin Digby  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPA16/4323  Respondent: 13565569 / Persimmon Homes (Matt Richardson)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Objectively Assessed Need

Guildford Borough has an indentified (OAN) of 693 dwellings per annum following the conclusions of the West Surrey Strategic Housing Market Assessment (SHMA) produced in September 2015 by GL Hearn. This assessment was carried out as part of the Housing Market Area (HMA) known as West Surrey which included Waverley and Woking in addition to Guildford. Persimmon have concerns that the SHMA may have under-estimated the OAN for Guildford due to migration from London into the borough expected to increase and by downplaying the need for jobs. The most recent population projections produced by Office of National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000 and this increase is anticipated to be faster than previously considered based on 2012 population figures, which have informed the SHMA which in turn has informed the housing requirement for the new Local Plan. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity to London, strong rail connections and reputation as being part of the commuter belt and a desirable place to live. It is on this basis that Persimmon believe that the OAN to be inaccurate and should be revised upwards taking into account the increases based on the 2014 projections as opposed to the 2012 figures. This should, in turn, mean that the housing requirements in the new Local Plan should also be revised upwards, taking into account the updated projections; the constant under delivery in recent years and the need to better allow for flexibility within the plan for economic growth reasons etc.

This point is further supported by the established planning principle of seeking to plan for balanced growth in jobs and homes where possible with a view to reducing the need to travel and commuting distances. The SHMA identifies that to support the forecast growth in employment a high level of growth is needed.

1. Five-year supply of deliverable housing land

Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%...where there has been a record of persistent under-delivery of housing, LPAs should increase the buffer to 20%". It has been established that GBC cannot demonstrate a robust five year supply
of deliverable housing land and at best the Council can show 2.5 years supply whilst at worst this drops to 1.4 years. It is also clear that Guildford has persistently and consistently under delivered and therefore those sites, which are capable of coming forward sooner should do, without being fettered by ill conceived policy requirements.

1. Housing requirements within new Local Plan (2013-2033)

The pre-submission version of the draft Local Plan makes provision for the delivery of 13,860 new homes over the plan period (2013-2033). This equates to 693 dwellings per annum which matches the identified housing need through the SHMA. The draft Local Plan states that "the delivery of new homes is expected to increase over the plan period, reflective of timescales associated with delivery of strategic sites". The draft Local Plan sets out the housing delivery in different tranches as below:

The above shows that there is proposed to be an increasing level of delivery over time as the plan progresses through the plan period. On this basis, to ensure the minimum housing requirements are achieved, over the first five years of the plan an average of 693 dwellings per annum are to be delivered. This raises an immediate concern given that GBC cannot demonstrate a five year land supply of any better than 2.5 years. As the net completions table also shows, the first two years of the plan period 2013/14 and 2014/15 have delivered significantly fewer than 693 dwellings per annum. We are concerned that insufficient sites have been identified to deliver this housing provision and concerns particularly over the deliverability of Wisley Airfield. Should the airfield be unable to deliver the allocated 2068 dwellings as proposed, then this number will have to be subsumed in other areas and given the local opposition to this scheme and impact on the highway network the deliverability of Wisley Airfield must be strongly questioned.

It is therefore clear that the evidence used for the Proposed Submission Local Plan Strategy from a housing perspective is not adequate or up to date.

Does the SHMA use the latest housing projections?

In addition, for those reasons above, whilst we recognise that the council has made some difficult decisions concerning some of the large strategic allocations, these are by their very definition slow to deliver units and it is clear that the council are not planning to deliver any meaningful increase in supply in the short term and for these reasons, those sites which are capable of delivering units quickly within the first five years of the plan should be considered favorably; this includes land to the east of Foreman Road, Ash.

With regards to more specific comments, Persimmon Homes are pleased that both policies A29 and A30 identify the site for development, however, we do not believe for those reasons below, that the identification of a road through part of the site is appropriate; feasible or indeed the correct approach. For the reasons set out below it is therefore clear that the evidence used for the Proposed Submission Local Plan Strategy and Sites is not adequate, up-to-date or indeed relevant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 20160718114724534.pdf (928 KB)
20160718152652831.pdf (1.4 MB)
20160718152735975.pdf (1.1 MB)
20160718152825671.pdf (1.5 MB)
Based on the housing supply trajectory, and after allowing for a backlog of under-supply projected for 2013/14 to 2016/17, the five-year housing land supply in 2017 (assumed to be the year of adoption for the Local Plan) would be equivalent to only 3.1 years’ requirements (a five-year deficit of 2,024) based on an annual requirement of 693 dpa.

The five-year housing land supply in 2017 would be equivalent to only 3.5 years’ requirements (a five-year deficit of 1,476) based on the five-year requirement in the trajectory which reduces the basic requirement for 2017 to 2022 by 522 dwellings (from 3,465 to 2,943) for reasons that are not explained. The relevant calculations are shown in Table 4 on the right.

There are several different assumptions that can be used to calculate a five-year housing land supply. In this case, we have incorporated the past deficit/backlog in the requirement for the following five years (the Sedgefield Method) and have applied a 5% buffer ‘to ensure choice and competition in the market for land’, following NPPF paragraph 47.

We have included the Council’s calculation of housing requirements for 2017-2022 as they appear in the trajectory, but can see no justification to depart from the overall target of 693 dpa. There may be a case for applying a 20% buffer for ‘a record of persistent under delivery of housing’ which would imply an even bigger gap between housing requirements and five-year supply. Further refinements will be possible for the examination of the plan when additional data is also likely to be available.

These problems of housing land supply are not overcome by the Council’s approach to phasing in Local Plan Policy S2, by which the planned delivery of housing is deferred until later in the plan period. As noted above, this approach is not justified in terms of housing requirements, but is solely a response to problems of housing delivery that result from the spatial development strategy. Local Plan Policy S2 is evidently not sound.

For a Local Plan to be found sound, it is essential for the local planning authority to be able to demonstrate that there is a five-year supply of specific, deliverable sites for housing, with an additional 5% buffer, ‘to ensure choice and competition in the market for land’ as well as ‘a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15’ (NPPF, paragraph 47).

In this case, the Land Availability Assessment demonstrates that there is not a five-year supply of housing land. It also shows that the projected supply of housing land will fall short of requirements for the next twelve years. There is therefore no possibility that the Local Plan should be found sound in these circumstances. A different spatial development strategy is required to identify sites for housing development that can be delivered in the early years of the plan period. Suitable, sustainable options will include sites that are closely related to the main urban areas and larger villages, and will entail a more detailed and realistic approach to reviewing the boundaries of the Green Belt.

**Conclusions**

The need for additional housing land in the early years of the new Local Plan requires looking at a variety of sources and locations, including a more realistic approach to Green Belt Review. Housing need represents one of the exceptional circumstances that can justify alterations to Green Belt boundaries, as described in paragraph 83 of the NPPF. Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans, which includes consistency with the Local Plan strategy for meeting identified requirements for sustainable development.'

The Green Belt & Countryside Study states that it was not seen as pre-empting the Spatial Development Strategy, but in practice Green Belt was a major determinant of the Spatial Development Strategy and, as the Green Belt Review was completed before a full, objective assessment of housing requirements in the SHMA, Green Belt and the Spatial Development Strategy have both become constraints on meeting housing requirements, especially in the early years of the plan.

The Spatial Development Strategy (Policy S2) and Green Belt Policy (Policy P2) are not based on sufficiently positive approaches to reviewing the Green Belt and settlement boundaries and do not give sufficient weight to meeting objectively assessed housing requirements throughout the plan period. They do not comply with the NPPF and cannot therefore be considered to be sound. Modifications to the Plan should include sites such as those identified in Wood Street Village as residential allocations within an extended settlement boundary and Green Belt inset, as described above.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPA16/2699  Respondent: 14188833 / Graham Mills  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing numbers:

Regarding housing numbers the Strategic Housing Market Assessment has given a housing need of 693 per year, this is far too high and is double the figure given just 4 years ago.

Guildford Borough Council have not given details of how the figures have been calculated, the report is therefore unaccountable so should not be used.

The SHMA is fundamentally flawed, historical errors have not been corrected, there are issues over student housing requirements and errors in the estimation of homes needed to support growth.

By contrast the independent report by Guildford Residents Association comes up with a much lower figure of 510.

All other boroughs have reduced the figure that their SHMA came up with, Guildford have taken the highest number.

Why have Guildford not constrained the figure?

The proposed 14,000 homes is a massive increase on the current housing stock, this is overdevelopment and is unsustainable. No justification has been put forward for such a massive increase in one town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3  Respondent: 15062081 / Chris Heath  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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 ridicules.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4  Respondent: 15062081 / Chris Heath  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) No provided evidence for the need of industrial buildings.

As far as I can see, the Guildford Borough Council have not provided the evidence needed to prove that there is a need for employment space as the Employment Land Needs specifies under the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by the GBC in 2013. The space in burnt common area is therefore no longer needed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2107  Respondent: 15062081 / Chris Heath  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

No provided evidence for the need of industrial buildings.

As far as I can see, the Guildford Borough Council have not provided the evidence needed to prove that there is a need for employment space as the Employment Land Needs specifies under the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by the GBC in 2013. The space in burnt common area is therefore no longer needed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1835  Respondent: 15062145 / Philippa Hackett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to register my objections to the New Local Plan.

The Plan does not seem to have a clear design for the whole area. If it does it certainly is not making it clear. Firstly the Transport Plan has been produced very late in the day (only released on the day of publication) and without this infrastructure, none of the developments should take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1538  Respondent: 15062625 / Stephen Groves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1708  Respondent: 15063745 / John Pryce  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any clear evidence for the supposed need for the number of additional houses proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/8  Respondent: 15068737 / Angela Blaydon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Since the previous ELNA evidence, there has been an 80% reduction in employment space required, thereby rendering the industrial space proposed at Burnt Common surplus to requirements. GBC have failed to provide sound evidence for the proposed development at Garlick’s Arch and have also exaggerated the number of houses required locally. If population growth is to be around 20,000, then the Borough will only require around 8,000 homes and not the proposed requirement of nearly 14,000. There are plenty of brownfield sites within the borough to accommodate around half of the homes actually needed and thereby negating the need to build on 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: PSLPA16/121  Respondent: 15076513 / Ian Groden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Forgive the additional comment but I have only just accessed the Strategic Highway Assessment Report Assessment, dated 6 June, which, somehow, I did not have before me on the 7th.

I am unable to ascertain from the report whether projected traffic statistics have been made for actual movement on the Burnt Common roundabout itself, which will have to accommodate increased traffic from many directions under the Plan.
I believe this is a critical point and I assume satisfaction on the ability of the roundabout to cope will be an essential requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/10  Respondent: 15081281 / Sabine Marke-Deleau  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the evidence. GBC failed to provide acceptable evidence in the terms of the Employment Land Needs Assessment 2015. The industrial space at Burnt Common is no longer needed. The housing numbers from the SHMA are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plant is exaggerated and far too high. **The Green Belt does not need to be built over and brownfield sites should be used.** GBCs Transport Assessment was not even available to councillors for the vote taken on 24the May. Infrastructure overload has had little attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/13  Respondent: 15082049 / Antony Marke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the evidence. GBC failed to provide acceptable evidence in the terms of the Employment Land Needs Assessment 2015. The industrial space at Burnt Common is no longer needed. The housing numbers from the SHMA are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plant is exaggerated and far too high. **The Green Belt does not need to be built over and brownfield sites should be used.** GBCs Transport Assessment was not even available to councillors for the vote taken on 24the May. Infrastructure overload has had little attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/14  Respondent: 15082721 / John Stack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GBC have failed to provide evidence relating to Employment land needs assessment 2015 (ELNA) this shows a reduction in employment since 2013.
It would seem that incorrect numbers have been used to inflate the need for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1201  **Respondent:** 15084897 / Save Send Action Group (Andrew Procter)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. EVIDENCE BASE

2.1 I object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent.

2.2 Key parts of the evidence base are flawed or based on withheld assumptions.

2.3 The current SHMA inflates the proposed housing figure due to the following factors:
   - the failure to correct for errors in the historical data for international migration flows;
   - the way it considers students and affordability, and
   - the flaws in the method for estimating the number of homes needed to support job growth;
   - the treatment of vacant property.

2.4 The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions.

2.5 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

2.6 The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

2.7 It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses.

2.8 The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points.

2.9 Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.

2.10 No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.

2.11 Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach.
2.12 The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but underestimates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, underestimates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

2.13 The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

2.14 I believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
“constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

1.8 The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

1.9 “There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

1.10 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

1.11 The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15104673 / Robert Morley</th>
<th>Agent:</th>
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I object to the lack of any evidence for the alleged housing need numbers I object to the lack of immediate provision of new schools I object to the lack of any immediate provision for doctors surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/50</th>
<th>Respondent: 15107937 / Ken Harding</th>
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<td>is Legally Compliant?</td>
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Also in the Plan there appears to be a total lack of any sensible evidence for the requirement for the overall housing numbers. Yet another reason to object to the Plan.

If this seemingly ill thought through Local Plan goes ahead there appears to be no provision
for new or additional schools places, or provision for Doctors Surgeries, considering the existing ones are already under immense pressure. Another reason to object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/833  Respondent: 15109537 / Elizabeth Alexander  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/98  Respondent: 15110177 / GORDON TURNER  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to proposals slipped into the council meeting in a very underhand way!

1. GBC have not followed any sort of correct process in the way they have dealt with local planning in my area. Evidence shows in 2014 a proposal for 430 houses went down after objection to 185 (Although a large number it could have been liveable) but some how has sneaked up to 485. These significant changes require a full consultation under Regulation 18 not the short cut which GBC are trying to sneak in through the back door.

1. The Strategic Housing Market Assessment 2015 results are ‘Elastic’ in there very nature. By using such data as Foreign students to inflate the need for GBC purposes. Remember there are Lies Damm lies and Statistics. The required 13.860 homes in the local plan, in this affluent area would probably house somewhere in the region of 41,580 if they each had 3 people living there. To that end half this number would suffice to deal with the increase in population growth Our area could not deal with that population increase unless there is some major investment we are missing like another school health centre etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/71  Respondent: 15111905 / Wendy Reed  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
OBJECT to the lack of any evidence for the alleged housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/80  
**Respondent:** 15114017 / Jo Wright  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 evidence that these high numbers of houses are actually needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/84  
**Respondent:** 15114657 / Jane Hill  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6) I object to the lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/86  
**Respondent:** 15114657 / Jane Hill  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also have the following questions:

1) if the need for new houses is for local people, where are these people living currently?

2) if the homes are for local people there wouldn't be any impact of the current highways so why do we need extra junctions on the A3?

3) will the local prescribing drugs budget increase to accommodate the extra population or will the current budget be squeezed tighter? Meaning we live in a postcode lottery for critical medicines to treat critical conditions.

4) what about other local services which will be impacted? Vets, police, fire, ambulance, are there extra provisions for these?

5) how do traveller sites work? Is this a cash revenue for the council? If so where will this money be spent?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/87   Respondent: 15114721 / Leslie Macnair   Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6 I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/89   Respondent: 15114721 / Leslie Macnair   Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6 I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/91   Respondent: 15114753 / Lauren Pott   Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object most strongly to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/97   Respondent: 15120641 / Elizabeth Wolfe   Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1167  Respondent: 15127777 / Keith Hammond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing need and EU referendum

It is stated (quite reasonably) in section 1.16, page 10 of the Local Plan, Strategy and Sites that development must be based upon ‘up-to-date and relevant evidence’.

- Because of the EU referendum result this clearly can no longer be the case. Population changes can only occur because of differences between birth and death rates (which is currently close to zero) and/or net migration into the area. Following the EU Referendum there will almost certainly be a significant change to this figure, particularly being located so close to London. So the evidence cannot be based upon up-to-date and relevant information.
- In addition the actual calculation has been kept secret from the residents of Guildford so it has been impossible for residents to verify that the data and calculations are correct, even before the latest changes in circumstances. No decision should be allowed before ordinary residents have a chance to scrutinise and challenge the validity of data and assumptions made.

Students

There has been considerable discussion on the availability of student accommodation on University land and that the University is not making the most of what is available. The plan also assumes that 60% of students will be accommodated within campus which implies 40% will not be.
If this accommodation was made available at the University it would solve multiple issues simultaneously and make the Local Plan so much less damaging. Presumably the vast majority of students not living on campus are living within Guildford Town itself and in affordable housing. The releasing of this housing would reduce the number houses needed to be built, the houses released for accommodation would almost certainly be 100% affordable housing and in the locations that are most often required. In addition it will have no or little impact on infrastructure (unlike other developments), in particular transport, and students would be on site in more appropriate accommodation, with the additional benefit of a reduction in travel and transport congestion, which is clearly a truly sustainable approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1474  Respondent: 15127809 / A W Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1473  Respondent: 15129441 / Janice Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/1740  Respondent: 15133377 / Joyce Vincente  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Respondent: 15136481 / Roy Padgett</th>
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<td>i. I object to the lack of evidence for the alleged number of houses needed.</td>
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<td>I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.</td>
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<td>The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.</td>
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i. I object to the lack of evidence for the alleged number of houses needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/141  Respondent: 15136929 / Richard Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Evidence

I object because:

- Guildford Borough Council’s Transport Assessment was not available to councillors for the vote taken on 24 May on the Draft Plan. Insufficient attention has been given to Infrastructure overload;

- Guildford Borough Council have not demonstrated the need to build on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/145  Respondent: 15138049 / Mark Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1864  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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<td>6) I object to the alleged housing needs</td>
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| Comment ID: PSLPA16/2345 | Respondent: 15140641 / Sandra Greenwood | Agent: |
I object to the lack of evidence for the alleged housing numbers needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15143073 / Sharon Rankin</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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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<td>I object to the lack of evidence for the need to provide such high housing numbers</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: PSLPA16/169</th>
<th>Respondent: 15143265 / Steve Hartnell</th>
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<td>I am writing because I strongly object to the proposed new Local Plan. My reasons are:</td>
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<td>The housing need figure is based on a methodology which has not been disclosed to the public – or indeed councillors. How can a plan progress or be agreed without anybody being in a position to assess such a fundamental component as the housing need? In my view it makes meaningful consultation impossible. A new assessment should be commissioned using a methodology that is transparent and capable of challenge if necessary.</td>
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1. I OBJECT to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

10. I OBJECT to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object on the grounds that there is a lack of evidence to indicate the need for such a large proportion of new housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I do not believe that the housing needs can have been properly identified, who will benefit from the 14000 new homes proposed?

This "Plan" needs to be scrapped and replaced by a well thought and researched proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/179  Respondent: 15144161 / Karen Patterson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2179  Respondent: 15144545 / Stacey Maxwell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4172  Respondent: 15145377 / WYG (S Fidgett)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

EXECUTIVE SUMMARY

This Planning Statement forms part of representations into the Guildford Borough Submission Local Plan: Strategy and Sites Consultation June 2016. The submission is made on behalf of the Earl of Onslow and the Trustees of the Clandon Estate.

The representations seek the allocation of land known as Onslow Park, south of the Epsom Road, Guildford for a sustainable housing led, mixed use development in order to help meet the needs of the Borough for new homes, jobs, community facilities and recreation space within the early part of the Local Plan period up to 2013-2033.

The most exciting element of this proposal is that should a resident choose to, they can go from school, through work and into retirement without ever having to use or own a car. The pedestrian, cycle, bus and train links take the resident to the greatest Capital City in the world the historic and picturesque town of Guildford whilst being able to play sport and walk in the countryside of the North Downs and AONB...and here is why.

Vision
The form of the development proposed is that of a sustainable urban extension on the eastern edge of Guildford, adjoining Merrow and follows the principles of a garden village.

In so doing, the proposals aim to provide a clear vision for a balanced, integrated and successful community with a long term commitment its development and maintenance and with a strong sense of its identity and place that is firmly rooted in the history of Guildford.

The key principles on which this vision are based include:

- Providing a community that is firmly based on the built, natural and cultural heritage of the Borough as a foundation for design and community development;
- A long term commitment by the Earl of Onslow and Trustees of the Clandon Estate to the management and maintenance of Onslow Park, the facilities and environment in conjunction with the community;
- Returning value to the community by investing in the infrastructure that supports the development including parkland, sports and recreation, education and housing and in the future management of Onslow Park;
- Involving the community and wider stakeholders in the planning, design and development of the site and the ongoing management of the community park and other shared spaces;
- A high quality of inclusive housing design, for people of all abilities, based on modern, low carbon construction standards, reflecting the use of local styles and materials but adopting designs appropriate to the site and its identity.
- Each of the homes will have access to its own amenity space and shared public open space as part of the community park and other facilities;
- A village community comprised of a series of walkable neighborhoods based around a traditional village green and cricket pitch, with parkland radiating from the centre to connect the existing town and new community with the surrounding countryside;
- An enhanced environment that adds to nature conservation habitats within and around the site and respects its setting, providing a variety of meadows and nature conservation areas, community parkland, sports, recreation and healthy living spaces;
- A community well connected to Guildford and part of the wider community within Guildford, well served and with new connections on foot or cycle and by a variety of modes of public transport. The proposals minimize the need to travel and optimize opportunities for connections and integration with the surrounding area.

The proposals are for a balanced, mixed use community comprising:

A mix of Housing: The masterplan provides for up to 1000 new homes, including family homes, starter homes, discounted private rented and affordable housing, retirement housing and assisted living.

A neighbourhood square: A flexible and attractive social space as a focus for activity, gathering, and holding community events, framed by the local centre and opening out onto the main recreational space.

Village centre: A village centre with potential new medical centre and pharmacy, a small convenience store and café with small scale offices above suitable for small business and start-up space.

An education campus: The provision of land for a new education campus on a 9ha site, providing a new 5 form entry secondary school and 2 form entry primary school for the east of Guildford. Based on the standards used by Surrey County Council and their requirements for the area, this aims to serve the wider community within Guildford and provide a through education opportunity with full supporting facilities and strong cycle and pedestrian links to other primary schools in the area, including the new primary school planned for the Gosden Hill development.

Employment opportunities: As part of a balanced community that provides employment, homes and services, the masterplan includes employment space in the form of a range of small scale offices within the local centre and separate office buildings, with a hotel and supporting services.

Sports and recreation: The proposals include a range of new leisure and sports facilities to serve the Guildford area. These include:
• A new Tennis Academy based around Merrow Tennis Club, with an academy building clay courts, indoor courts and an additional outdoor court.
• A new Cricket clubhouse and cricket pitch at the heart of the open space and the community hub,
• Football and sports pitches shared with the new education campus
• A new park totalling over 24ha
• New informal sports and recreation facilities including recreational routes with seating areas and a ‘trim trail’ with outdoor gym equipment, children’s play-space, Suitable Alternative Natural Greenspace (SANGs), wild areas and recreational routes to the Surrey Hills AONB
• New nature conservation areas to enhance the range of habitats and species within the site
• New woodland and hedgerow planting based around the existing features within the site, to enhance the long term landscape setting.

Sustainable transport

The site is sustainably located and accessible from within the urban area, with good access by foot, cycle and bus to the town centre and other destinations. The proposals seek to enhance this further in a number of ways.

New connections to existing footpaths and links to the centre of Merrow, with pedestrian and cycle routes throughout the development and an enhanced footpath and cycle link to the proposed Merrow Station.

The enlargement of the current Park and Ride facility, increasing the current capacity of the facility and adding the potential for cycle hire facilities to diversify the options for onward travel.

Connections to rights of way linking to the Downs and Newlands Corner to enhance access to recreational routes and the countryside from Guildford.

Sustainable Development

Government policy requires planning decision to pursue the most sustainable options for growth in order to meet the needs of the community in the most sustainable manner, that reduces the need to travel, maximises the use of alternative means of transport and maximises access to the benefits of growth to the optimum number of people.

Onslow Park forms part of the most sustainable spatial development strategy for Guildford. The site was identified in the Council’s Countryside and Green Belt Study, forming part of the evidence base for the Local Plan, as one of the preferred options for Green Belt release.

The site constitutes a well contained land parcel which is strongly defensible on all boundaries, meaning the site’s controlled release would not encourage urban sprawl. In this way, the allocation of the site at Onslow Park would not jeopardise the wider purposes or functionality of the Green Belt.

The benefits that can be delivered for the Borough through the sustainable spatial strategy proposed as part of Onslow Park cannot be matched in less sustainable locations away from the town that do not provide benefits to the existing community or help support investment in enhanced services and infrastructure within the town.

It is also one of the most sustainable locations for growth, well related to the principal town within the Borough and accessible to the majority of the Borough’s population and core services and facilities. It is readily accessible by foot, cycle and public transport and contains one the towns existing park and ride facilities, which is proposed to be doubled in size as part of these proposals.

The site is also well related to the proposed new station at Guildford East (Merrow) and the present station at West Clandon.

Onslow Park compliments the proposed allocation of land at Gosden Hill and Blackwell Farm and where relevant and necessary, would help support the infrastructure required to serve the needs of the town.
The Site has been previously inaccurately assessed in the Green Belt and Countryside Study which although it recommended the possible removal of the site from the Green Belt and its allocation as a sustainable urban extension, also failed to appreciate (inter alia) that the proposed development area of Onslow Park falls entirely outside the AONB, has no significant impact the setting of historic towns and in addition, presented an inaccurate measurement of distances to the local facilities. We consider that if these assumptions or errors had not been made, then Onslow Park is likely to have been identified as a preferred, sustainable location for growth.

Onslow Park would deliver sustainable development through:

Economy: the provision of significant scale of new mixed use development within the early years of the Plan, supporting economic activity, with housing, employment space, a hotel and additional facilities supporting the growth and development of the economic base of Guildford.

Environment: the enhancement of the landscape and natural habitats within and around the site, the adoption of low carbon, sustainable construction, the development of high quality homes zones and healthy living spaces that combine, sport, recreation and natural areas within and surrounding the community.

Social Infrastructure: the provision of a wide range of social infrastructure in the form of affordable and private rented homes as well as starter homes, recreational facilities, enhanced access to the countryside and North Downs, schools, a sporting hub with tennis, cricket, football and multi-use pitches, enhanced park and ride, medical and other facilities delivered hand in hand with the development of housing as part of a sustainable community that enhances facilities for the existing population.

Delivery

Housing and the supporting community and environmental infrastructure proposed at Onslow Park can be delivered in tandem within the first part of the Local Plan period, when the need for housing is greatest.

The site is not subject to major infrastructure or other constraints that would delay or prevent an early contribution to supply. The land is available and is not subject to any overriding constraints. Off-site transport improvements can be delivered in conjunction with the development proposed.

Housing supply within the proposed Local Plan is below the level required for the first 15 years of the Plan, due to the time needed in bringing several of the strategic sites forward. Hence there is a need, in order to meet the housing needs of the community, to increase supply early in the Plan period. This is precisely when Onslow Park can make a significant contribution, helping meet the required housing numbers in the early years of the plan.

1.0 INTRODUCTION

This document forms a written Planning Submission to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites consultation July 2016. It has been prepared by WYG on behalf of The Earl of Onslow and The Trustees of The Clandon Estate. It outlines their vision for the creation of Onslow Park, a proposed ‘garden village’ adjoining the urban area of Guildford and forming a sustainable urban extension east of Merrow.

The Onslow family have had a long, extensive and positive association with Guildford, both as custodians of Clandon Park and other land within the Borough and as part of the local community and history of the town. The land for Stoke Park, Guildford Cathedral and Onslow Village, now a thriving conservation area in the heart of Guildford, were all legacies of the Onslow Estate and are now key assets in the history and fabric of the town.

Reflecting his long term commitment to the community and to Guildford, these proposals, by the Earl of Onslow, are a response to the current Local Plan debate over the best way to accommodate the housing, employment, community and the other needs of the town and the Borough’s residents. They represent one option, we believe the most sustainable option, which might be considered for the development of Guildford.

The purpose of this document is to outline these proposals and to provide both context and evidence that justify the proposals and demonstrate the sustainable nature of the proposals and how they accord with the fundamental principles of the Proposed Submission Local Plan (the Local Plan) and the National Planning Policy Framework (NPPF). The
representations are, by necessity, expressed as an objection to the Submission Local Plan and the omission of the Onslow Park site.

The representations are accompanied by:

‘A Vision for Onslow Park’ produced in April 2016 which provides some of the background to the design and masterplanning of the proposed development;

A Preliminary Landscape Visual Appraisal which considers the potential for Landscape and Visual impacts as a result of the proposed development;

A set of Zone of Theoretical Visibility sector graphics, which show where development of nine metres high across the proposed Onslow Park would be visible from a height of two metres within the surrounding area (before any landscaping mitigation is considered for the site) (importantly the proposed development would hardly be visible from the conservation area);

‘Onslow Park Transport Feasibility Report’ July 2016 which considers the transport issues arising from the proposed development and shows how this accords with the transport policies proposed in the Local Plan.

This Submission provides evidence over the:

- the nature of the representations and development proposed;
- the deliverability of the development and its ability to contribute to supply in the first 5 years of the Local Plan;
- suitability of the site for the development proposed; and
- justification that demonstrates why the site should be allocated within the Local Plan in order to meet the requirement to achieve sustainable development.

This submission also considers the need for housing and employment by reviewing the evidence base on which the DLP has been produced.

Finally, comments are made on some of the wider strategy based policies and the impact that these may have on deliverability in providing for the needs identified by the Council.

2.0 REPRESENTATIONS

The approach taken in the Submission Local Plan is generally supported, our comments set out within this section relate to those areas of the Local Plan where it is considered that its strategy or policies could be improved and do not currently meet the needs of the Borough, enhance the lives of the community or deliver development that is sustainable.

The basis of these representations is essentially that:

- The spatial strategy of the Local Plan should state clearly that Guildford is the primary town within the Borough and is the most sustainable location for growth both within and adjoining the urban area;
- It offers the best opportunity to for development to support the vitality of the town and provides good access to its existing range of goods and services, employment, community and cultural uses for the new housing proposed in the Plan;
- It also maximizes the benefit for the existing community arising from additional investment in housing, employment, recreation, transport infrastructure and new community facilities by locating these where they benefit the most people;
- This is also the location where the opportunities to minimize the need to travel are greatest and where opportunities to access modes of transport other than the car are maximized;
- While brownfield opportunities are to be maximized, there is also a need to consider sustainable urban extensions as the next most sustainable option for meeting the identified housing, employment and other needs;
- This option is preferable in both policy and practical terms, to less sustainable locations that are remote from the urban area and are by definition, more restricted in terms of access to the full range of goods, services and transport options than Guildford itself provides.
• The location of development, integrating the urban area with the countryside in the form of a sustainable garden village, helps provide the most appropriate basis for a new sense of community and a sense of place that respects and enhances its environment.

These representations therefore, propose the allocation of land at Onslow Park, south of the Epsom Road, Guildford to form a new garden village forming a sustainable urban extension adjoining the east of Merrow. This would provide for a new allocation policy, A58:

**POLICY A58**  
Onslow Park, Epsom Road, Guildford

### Allocation

This is a residential lead mixed use development, allocated for:

- Approximately 1000 homes, including some specialist housing in the form of retirement village or extra-care housing, starter homes and self-build plots; and
- 4 traveller pitches; and
- A five Form Entry (FE) secondary school (approximately 800 pupils, based on approximately 160 pupils per academic year group) with shared sporting facilities suitable for football and a range of sports and local groups;
- A 2FE primary school (approximately 450 pupils, based on approximately 65 pupils per academic year group);
- Approximately 2,100sqm of office and employment space and a hotel serving the needs of business and the wider community;
- A new medical centre, pharmacy and small convenience store (approximately 500sqm);
- A tennis academy with café and changing facilities (10 courts);
- A new cricket clubhouse and pitch, enhancing existing cricket facilities on the Site; and
- Approximately 24ha of recreational parks, play and sporting facilities, informal open space and Suitable Alternative Natural Green Space (SANGs).

Recreational routes linking Merrow, Clandon and the North Downs.

Access to the A25 Epsom Road

A doubling in the capacity of the existing park and ride facility and introduction of cycle hire facilities and vehicle charging points.

Off site cycle and pedestrian improvements to the proposed Guildford East (Merrow) Station and linking with existing routes within Guildford.

### Requirements

**Infrastructure**

Primary vehicle access will be via the existing roundabout serving the park and ride on the A25 Epsom Road;
A secondary left in and left out access for emergency purposes to the east or west of the existing access onto the A25;

An expansion in park and ride facilities (currently 335 spaces) to provide up to 670 spaces

The necessary supporting infrastructure to be provided on site including the primary school with early years provision and if not provided at Gosden Hill, the secondary school, public open space and associated recreation facilities. This may also include a medical centre/GP surgery.

Recreation space including formal playground facilities, informal recreation and allotment space.

Bespoke SANG to mitigate the impacts of part of the site on the SPA

Green links to the adjoining North Downs and countryside

Where necessary to mitigate the impact of the development a proportionate contribution to off site transport infrastructure.

Maintenance of a green buffer on the Epsom Road A25 boundary and sensitive design to ensure maintenance of the transition from urban to greenfield.

The site is identified in Figure 1 and the overall masterplan of the development proposed is set out in the accompanying Onslow Park Vision document. The proposed development is explained in further detail in the remainder of this statement.

The site is currently occupied by Clandon Golf, the Merrow Park and Ride facility and Merrow Cricket Club. The land was extensively remodelled to form the golf course in recent years and there is permission for a new club house complex. The golf club is one of many in the area and would not limit such opportunities if it were to become Onslow Park.

The site is surrounded by extensive woodland to the east and south and the urban edge to the west, thus limiting longer range views and providing a strong sense of visual enclosure.

A good vehicular access is provided via the existing roundabout on the northern boundary of the site, on the A25.

**Garden Village**

The proposed garden village comprises approximately 59 hectares of land, around half of which is proposed as parkland, public open space, sports and recreation facilities, allotments and nature conservation areas and meadows. The proposals are based upon a number of core principles:

- Providing a strong and clear vision that helps to shape a clear sense of place and community
- A long term commitment by the Earl of Onslow and Trustees of the Clandon Estate to the management and maintenance of Onslow Park, the facilities and environment
- Returning value to the community by investing in the infrastructure that supports the development including parkland, sports and recreation, education and housing and in the future management of Onslow Park;
- Involving the community and wider stakeholders in the planning, design and development of the site and the ongoing management of the community park and other shared spaces;
- A high quality of inclusive housing design, to modern, low carbon standards with a strong sense of place, reflecting the use of local styles and materials but adopting designs appropriate to the site and its identity. Each of the homes will have access to its own amenity space and shared public open space as part of the community park and other common facilities;
- A village community comprised of a series of walkable neighbourhoods based around a traditional village green and cricket pitch, with parkland radiating from the centre to connect the existing town and new community with the surrounding countryside;
• An enhanced environment that adds to the nature conservation habitats within the site and respects its setting, providing a variety of meadows and nature conservation areas, community parkland, sports, recreation and healthy living spaces;
• A community well connected to Guildford and well served on foot or cycle and by a variety of modes of public transport. It minimizes the need to travel and optimizes the opportunities for connections and integration with the surrounding area.

The essence of the proposals is a wish to create a real sense of place, of pride and a sense of belonging that enhances the lives of the existing and proposed community by providing a range and quality of homes and open spaces, community and sporting facilities and employment opportunities that benefits current and future residents alike.

**Housing**

The proposed housing would include approximately 1000 high quality new homes with a vibrant mix to meet the needs of a balanced community. This would include:

- A mix of 1, 2, 3 and 4 bed family homes
- A mix of private and affordable housing with affordable homes contributing over 40% of the total, including starter homes
- A significant proportion of private rented sector housing (PRS) including the potential for discounted market rent
- Retirement housing and care village providing on site care and progressive support to suit individual circumstances
- A proportion of self-build plots
- 4 serviced travelers’ pitches

One of the aims of the proposed garden village is to provide a high proportion of privately rented homes, some of which will be offered at discounted market rents of around 70-80% of market values. This will help provide good quality homes and an alternative market tenure that is of particular value in supporting a vibrant and mobile workforce, essential in supporting the needs of the economy.

The masterplan provides an illustrative layout which demonstrates the high quality of environment proposed which presents a series of home zones each with its own character and which together form part of a cohesive garden village.

**Community Tennis Academy**

The tennis academy is proposed in conjunction with Merrow Lawn Tennis Club (MLTC) who wish to create a new Guildford Community Tennis Academy. The aim would be to provide a community tennis academy comprising outdoor and indoor courts, a clubhouse to provide café offer to tennis players and local residents with changing room facilities.

It would provide a performance tennis academy, adjacent to the existing tennis club facilities for aspiring local players, supported by existing world class coaches. The academy would be linked to MLTC, with the aim of being endorsed by Lawn Tennis Association and managed on a commercial basis. The academy would provide a professional tennis centre standard of operation, with community access and links with local schools and community groups and with scholarships for talented athletes.

The design would be sensitive to its setting as part of the sporting and community hub within the overall development and in keeping with the environment. There would be a combination of indoor and outdoor courts to allow extended playing time throughout the year. Guildford has no dedicated indoor tennis courts currently and hence this is a direct response to an unmet need for tennis in the Guildford area.

Access would be gained via the main site access and community centre adjacent to the park and ride.

**Cricket**

The Cricket facilities would include a replacement to the existing cricket pitch that is of an enhanced size and built to a standard suitable for competition level to match Merrow Cricket Club’s aspirations and support their fixtures in both the
Surrey County and Fullers Leagues as well as providing for training and colts sides. The club have a thriving membership and active youth and community association. The proposed facilities would benefit from a new clubhouse with changing and kitchen/refreshment facilities and supported by external nets facilities for coaching and practice.

The cricket facilities would be at the heart of the community park, open space and informal parkland that stretches throughout the development proposed. It would be a key link in the sporting hub that encourages sporting excellence and maximum participation in the community. It links the tennis academy to the west with the village centre, open space and sports pitches and educational campus to the east. It would provide a focus for community activity and would be accessed from the main site access at the park and ride and with additional parking adjacent to the village centre.

**Community Park and Public Open Space**

The masterplan proposes a total of approximately 24 hectares of green space, comprising a mix of formal and informal recreation, sporting and nature conservation areas. The proposed facilities include:

- A community park which encompasses the site and runs through its heart, providing a high quality setting for the village, softening and screening the relationship with the existing eastern edge of Merrow and providing a pivotal connection within the development and linking with the adjoining countryside;
- Formal sports provision in the community tennis academy, the cricket pitch and village green, formal football and sports pitches, school playing fields, allotments, sports and recreation trail, footpaths, cycleways and bridleways;
- Informal nature conservation including wildflower meadow, retention and management of the existing the Site of Nature Conservation Importance, new hedgerow and woodland planting;
- Children’s play space based on encouraging interaction with the natural environment.

The proposed facilities meet or exceed the relevant standards for residential development and are a fundamental part of creating the sense of place that underpins the garden village vision.

**Employment and Hotel**

The proposals for Onslow Park include a new business hub, as part of a sustainable mixed use development, based around a series of office buildings on the eastern side of the village centre. This links the park and ride with the proposed education campus and helps to cement the connection between enterprise and learning. Approximately 2,100sqm of modern office space is proposed in a series of office buildings, suitable for flexible, high quality business space, including accommodation suitable for starter and incubator units.

The proposed Education Campus comprises both a primary school with early years provision and a secondary school, that meets the needs of the development and the wider area.

It is acknowledged that there is a secondary school site now proposed within the Gosden Hill allocation. The proposed secondary school at Onslow Park is an alternative site for the proposed school and one that is less constrained. The aim of locating the school within Onslow Park is to provide a clear connection with the sporting hub that is formed by the combination of formal sports pitches, the cricket and tennis academy, which together provide unrivalled facilities for both the school, local clubs and the community. The integration of sporting and educational aspirations is part of the key successful sports and a healthy environment for education.

Alongside the proposed office space, it is proposed to locate a hotel to support the business and wider needs of the area. This includes meeting and conference space and will help support the wider visitor and tourism strategy for the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
OAN Update

The evidence base has an identified OAN of 693 dwellings per annum following the conclusions of the West Surrey Strategic Housing Market Assessment (SHMA) produced in September 2015 by GL Hearn. This assessment was carried out as part of the Housing Market Area (HMA) known as West Surrey which included Waverley and Woking in addition to Guildford.

The most recent population projections produced by Office of National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000. This increase is anticipated to be greater than shown by the 2012 population figures. The 2012 figures informed the SHMA which in turn has provided the basis around which the housing requirement for the new Local Plan is formed. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity to London, strong rail connections and reputation as being part of the commuter belt and a desirable place to live.

It may be necessary therefore, to consider whether the SHMA should be revised upwards taking into account the increases based on the 2014 projections and whether the housing requirements in the Local Plan should also be revised upwards. It would suggest that the identification of other sites for development should be considered as part of this process, in conjunction with the consideration of the suitability and sustainability of the sites proposed.

5 Year Housing Land Supply

Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to:

“Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5%...where there has been a record of persistent under-delivery of housing, LPAs should increase the buffer to 20%”.

It has been established that Guildford cannot demonstrate a five year supply of deliverable housing land with the benefit of planning permission. Current Council estimates are at best a 2.5 years supply. It has not been able to do so for a number of years and hence the buffer adopted should equate to 20%.

It is therefore clear that without significantly more available land, Guildford cannot expect to be able to show a five year supply in the short term, nor on the basis of the trajectory for the period up to 2022/23.

Green Belt

It is acknowledged that the Local Plan is looking to make difficult decisions regarding the allocation of future development based on a balanced judgment of the need to meet OAN whilst also preserving and protecting the Borough’s natural environment, including the Green Belt.

The evidence base produced by the Council clearly indicates that there is limited capacity in the urban areas of the Borough to meet objectively assessed need (economic or social). Therefore, the Green Belt and ‘Countryside Beyond the Green Belt’ requires review and some release in order to provide capacity to accommodate future growth if the unacceptable effects of a continued failure to meeting housing employment needs are to be minimised. Continued failure to address the issue removes the ability of many to afford or have access to good quality housing, imposes social costs, prices younger people out of the area in particular and has negative consequences for growth and the economy and vitality of the area.

Broadly the Council has sought to evenly distribute development (economic, social and housing) throughout the northern, eastern and western parts of the Borough rather than adopting a sustainable spatial strategy.
It is clear from both the Local Plan and the evidence base that accompanies it, that the Council acknowledge that new sites, including those in Green Belt and Countryside locations, are required in order to adequately plan to meet need. We concur with this view.

Green Belt and Countryside allocations have been made, in part, on the basis of assessments made in the Green Belt and Countryside Study (GBCS). This study sought to review all areas of the Green Belt and Countryside in the Borough and assessed them against the five purposes of the Green Belt and their overall sustainability credentials.

We are generally supportive of the approach taken in this regard, but believe there are some inaccuracies and errors in the methodology applied, which have resulted in some sites being inaccurately assessed and / or over looked, including Onslow Park.

In terms of environmental considerations it is considered that the extent of Green Belt land within the Borough is clearly a constraint to meeting its development requirements and that if the Borough is to plan successfully for a sustainable future, elements of the Green Belt will need to be reviewed and released.

It is also relevant that the majority of the Borough is located within the Green Belt and that other designations, such as AONB, SSSI, SPA and SAC heathland further constrain its ability to meet the needs of the population. These are together part of the high quality environment that is essential in the character and quality of the Borough.

The Green Belt was designated following Acts of Parliament in 1939 and 1944 and at that time there was no ability to predict how the population would grow. Therefore, whilst the principles of the Green Belt should clearly be upheld and its extent defined, in order to plan properly for the long term, the review of Green Belt boundaries is something that is required from time to time in order to meet the needs of the area.

Realism is required that in this case, population growth has surpassed expectations and that the Country, Counties and Borough’s need to provide satisfactory levels of housing and employment opportunities for its population. ‘No change’ is not a viable option and would lead to increasingly serious socio-economic problems for the area.

The proposed releases of land from the Green Belt also need to be placed in context. Approximately 89% (24,000ha) of the Borough is currently Green Belt, and the majority of this can be retained as such. Only a relatively small amount of land release is required to meet objectively assessed need and this should not be viewed as a weakness; rather it should be viewed as an opportunity to address a long standing issue in the Borough enabling a future whereby the most valued / important environmental strengths and green infrastructure of the Borough are protected, whilst also facilitating sustainable development that meets the social, environmental and economic needs of its population in areas which are not so valued / important.

The review of Green Belt and the provision of sufficient land for development in the Plan period, enhances the level of protection afforded to the rest of the Borough including both Green Belt and Countryside Beyond the Green Belt. This will also enable the creation of a better balanced environment that recognizes the quality of the countryside whilst also providing for the Borough’s growing population.

The Green Belt review that is signaled in this Local Plan represents a significant opportunity for the Borough which should be embraced. The need to positively plan for Guildford’s future, to help meet its needs and maintain a sustainable and balanced community within a high quality environment is what the Local Plan is about.

The Green Belt and Countryside Study, (GBCS), February 2013 (Updated) is an evidence based document that has sought to provide a borough-wide assessment of the Green Belt and Countryside, assessing various sites and locations against the purposes of the Green Belt, which in turn enabled potential areas suitable for development to be identified.

4.56 The NPPF itself states that “when reviewing Green Belt boundaries we should take account of the need to promote sustainable patterns of development”. As such one of the components of the original study was to consider the most sustainable patterns of development, hence concentrating on the area around Guildford.
4.57 Volume 1 of the Green Belt and Countryside Study identified the site of Onslow Park as parcel E1. It was considered as being capable of release without compromising the purposes of the Green Belt. It commented in its summary at para 1.16:

“Land parcels C1, C2 and E1 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the east of Burpham and Merrow, enclosed by the A3, Frithy’s Wood and residential properties on Merrow Lane (C2); contained by Cotts Wood, the railway line and Merrow Common (C1); and continuous with residential properties following Abbot’s Way and Trodd’s Lane near Merrow Downs, within the newly constructed golf course (E1). The PDAs are generally enclosed by woodland and hedgerow treecover, rising topography, principal highways and railway infrastructure. Land parcels C1 and C2 are located directly to the west of Frithy’s and Cott’s Wood Site of Nature Conservation Importance (SNCI). Land parcel C1 is located to the north of Registered Common Land at Merrow Common and to the north west of Clandon Park Registered Park and Gardens. Land parcel E1 is partly located within the Surrey Hills AONB, directly to the north of Merrow Downs Registered Common Land, and to the south of Clandon Park Registered Park and Gardens. Any development within Land parcel E1 would therefore need to carefully consider the landscape and visual effects on the Surrey Hills AONB, and development within this designation should only be brought forward if no other suitable areas outside the AONB can be developed.”

4.58 Although it referenced the AONB as the main constraint in relation to parcel E1 it should be noted that this originally defined parcel boundary extends significantly beyond the area of Onslow Park, which excludes all of the land within the AONB and occupies only that open ground outside the AONB occupied by the recently man made landform of the golf course.

4.59 Hence there is no basis for its exclusion and if it had been assessed on that basis, it would have been identified in a similar manner, alongside Gosden Hill as a sustainable location for growth. The Study commented that these parcels made the least contribution to Green Belt purposes:

“For clarification, the above 20 land parcels were identified for the sustainability assessment within Stage 3 due to them contributing least to the purposes of the Green Belt (scoring 0-2 points) within Stage 2.

4.60 The Study in Volume II concluded:

“Guildford (East): Land Parcel E1, Land at Epsom Road. Land parcel E1 located within the newly constructed golf course and near the Park and Ride on the Epsom Road to the east of Merrow (Guildford, East) provides opportunities for development (1013 residential dwellings) without significantly compromising the purposes of the Green Belt (Score 1). The land parcel would appear continuous with residential properties following Abbot’s Way and Trodd’s Lane near Merrow Downs. The land parcel is partly located within the Surrey Hills AONB and to the north of the AGLV, Merrow Downs Registered Common Land and an SNCI. Clandon Park Registered Park and Gardens is located to the north of the land parcel. Moderate treecover to the east and south contains the land parcel, whilst much of the area remains unconstrained in environmental capacity terms. The Green Belt boundary could be realigned to exclude the newly constructed golf course area bordered by treecover on Merrow Downs and the A25. Land parcel E1 scored 5.57 and was ranked 19th according to current sustainability credentials.”

4.61 The parcel was recommended for release and the proposed new green belt boundary was identified in the Study illustration reproduced below: <see attachments>

However, notwithstanding this, the sustainability appraisal significantly understated the sustainability of the site. This is due to the fact that the appraisal (see para 7.18 of Volume II) measured distances from the centre of the parcel to the relevant facility being considered. These are identified on the plans in Volume IV and it can be seen that parcel E1 was significantly bigger than identified above and extends further south. In the case of parcel E1, the distance was effectively measured from a point significantly further south of the centre of the currently proposed site (or the site identified above) and outside its southern boundary. Hence the actual score is significantly better than predicted for the enlarged parcel considered. An example of this is shown below: <see attachments>

The resulting spatial rationale for the proposed potential releases from the Green Belt were summarised within the Study in Volume 1 (App II) and extract is shown below from the updated Addendum to Volume II App 8 (the revised Potential
Development Areas), which clearly shows the rationale for the proposed site E1, Onslow Park, as a sustainable urban extension on a key route into Guildford, well located on the east of the town, complimenting Gosden Hill (C1 and C2) and Blackwell Farm (H1 and H2).

**Employment Land Assessment**

At the current time, one of the most significant weaknesses of the Borough is that housing supply is not meeting the local economy’s needs or demand for people (staff) and that a significant amount of the Borough’s population out commute to work. Recruitment within the Borough suffers as a result.

In addition to this there is a lack of suitable commercial land and the Borough’s existing employment stock is not meeting the needs of local business. This is identified within the evidence base for the Plan.

Therefore, key to improving employment opportunities is ensuring that the correct mix and supply of employment accommodation is available in the Borough to meet with needs. This would help to reduce out commuting, improve sustainability and if balanced with an adequate supply of housing will ensure that the local economy remains strong and becomes more self-sufficient.

The Employment Land Assessment (ELA) undertaken by the Council sought to assess how much employment land is likely to be needed within the Borough in the Plan period. It concludes that there is not enough employment land to meet future growth needs, a conclusion which we agree with. We would question however, the amount of employment land that is required to meet need, which we consider to be underestimated.

The ELA estimates that the Local Plan should look to provide an additional 10.5-20ha of ‘B’ use class floorspace to meet objectively assessed need. It then goes on to state that currently the Borough has the potential to deliver 7.4ha from existing urban and settlement locations, which is not enough to meet need. To put this in context 20ha of land would only equate to 1.27ha per annum over the plan period.

In this regard the conclusions of the Local Business Survey are helpful as this states that more than 50% of the firms which responded to this survey expected their floor space requirements to increase over the next 10 years, with 66% stating that they would not be able to expand at their current location.

We also feel that the ELA has artificially reduced the requirement for additional employment floorspace. This is odd considering that there has been no notable commercial development since 2008, yet industries within the Borough are growing. For example Allianz Insurance has grown from 700 to over 1,100 employees in the last few years and it is clear that other companies would like to grow if floor space allowed (based on the findings of the Local Business Survey highlighted above). This artificial reduction is compounded by the assumption that working from home will increase, which is likely to be the case, yet demand for B1(a) accommodation remains a constant and supply is diminishing with the loss of offices to residential use, and homeworking for B2, B8 and B1(c) industries is not practical. Therefore, this conclusion seems rather unrealistic.

There is also an assumption in the document that unimplemented permissions will create the additional land required for development, as will existing vacant accommodation. However, this is overly simplistic and a dangerous strategy to rely on. Some of the vacant accommodation will be lost to other uses, and indeed may be more suitable to other uses, and the amount of vacant accommodation in the Borough is not a constant. Such a policy does not therefore allow for growth and also does not take into consideration that some of the vacant, outworn accommodation is simply no longer desirable for commercial purposes and therefore is better placed for redevelopment to other uses, some of which will be under permitted development rights. There is also limited ability for existing employment areas in the Borough to intensify. The majority of the Borough’s stock comprises of developed estates with little or no expansion capacity.

It is important that the Local Plan and the allocations within it are based on a progressive evidence base that seeks to encourage new business as well as supporting existing ones.
It is also relevant to highlight that the allocations in the 2003 Local Plan were insufficient and did not meet need. This document allocated 21.7ha of land for employment purposes. However, the 20ha recommended in the Assessment is essentially the same as this insufficient allocation; therefore it would seem that the Council were at risk of repeating past mistakes in under-allocating for employment need. 20ha also breaks down to a mere 0.8ha of land a year (over the 25 year period considered in the Assessment) which equates to a very small level of commercial floor space. This is clearly not enough to meet with need.

It is clear on the basis of the very real need identified for commercial development that there is a need to identify suitable sites outside of the main urban areas and settlement boundaries, which the Local Plan seeks to do. It is important that this is integrated within large scale new housing developments as sustainable growth across the Borough and balanced communities based on mixed use principles. It is also essential that an adequate amount of land is allocated, as too little land will stagnate the Borough’s economic growth and development is needed to attract growth and jobs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Onslow Park Vision Document.pdf (8.1 MB)
- Onslow Park Planning Statement.pdf (2.1 MB)
- POLICY I1 & APPX C_20160715133341.pdf (3.4 MB)
- Onslow Park Site Accessibility Appraisal and Transport Feasibility Study Report.pdf (1.5 MB)
- Onslow Park LVIA.pdf (3.4 MB)

Comment ID: PSLPA16/4174  Respondent: 15145377 / WYG (S Fidgett)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6.0 CONCLUSIONS

This document forms a written Planning Submission, prepared on behalf of The Trustees of the Clandon Estate in relation to the Draft Local Plan: Strategy and Sites (herein referred to as “the DLP”). The submission proposes the allocation of land known as ‘Onslow Park’ lying to the south of the A25, Epsom Road, Guildford for a sustainable urban extension. The proposed allocation would result in a mixed use, residential led development that would provide a mix of housing, education campus (including primary and secondary school), employment (B1a office), medical centre, small convenience store, recreation and community facilities, traveller pitches, public open space and landscaping. In order to facilitate the allocation, it is also proposed that the site is excluded from the Green Belt.

The initial masterplan, which illustrates the key principles underpinning the vision and how the proposed garden village might look, is set out in the accompanying ‘Onslow Park Vision’ document.

Whilst we may all question the need for development within the area, the Lord Onslow and the Trustees of the Clandon Estate recognize that the needs of the community need to be met and that any policies and proposals included within the Plan should contribute positively to sustainable development.

This means meeting the needs of the environment, the economy and the community and must provide enhanced access to a range of homes, community facilities, jobs and open spaces to as many people as possible.

Hence we consider that the major part of the development the Borough needs should be well related to the urban area of Guildford as its primary town and which provides the widest range of facilities for the people of the Borough.

Only by locating new development and new facilities within or on the edge of the main centre of population can development be truly sustainable. Here, it can maximize access to the homes, jobs and community facilities proposed and enhance the lives of as many people as possible. It is the only way to provide real choice in modes of transport,
maximizing access to walking, cycling and modes of transport other than the car, including park and ride and good quality rail services.

The proposals for the allocation of Onslow Park recognize the potential for a sustainable new community to be formed as an extension to the town that benefits the adjoining community.

The proposals would provide for new recreational and open space facilities, including a new cricket pavilion and pitch, a new secondary school, healthcare provision, employment, community facilities and a balanced mix of housing, including family housing, retirement accommodation and affordable and starter homes.

All would be set within a landscaped community that provides pedestrian and cycle access to the downs at Newlands Corner and to the countryside beyond.

It is considered that the land at Onslow Park should be identified in the Local Plan for the following reasons:

- The site is in a sustainable location and recognizes the role of Guildford as the principal town within the Borough, with good access to public transport and a wide range of cultural, social, retail, leisure and other facilities and services
- The allocation would be compatible with a sustainable spatial strategy channeling growth to the principal town in the Borough to support its growth and achieve sustainable patterns of development that reduce the need to travel;
- The proposed uses would complement and be compatible with adjacent land uses, enhancing access to recreational, educational and other facilities for the existing and proposed community
- The proposed development would work with and support other nearby development that is proposed for inclusion in the Local Plan
- The proposed development would also support the key infrastructure that supports the growth of Guildford and its economic prosperity, including new pedestrian and cycle facilities, the proposed Merrow railway station, schools and other facilities
- The development proposed includes a mix of uses that together support a sustainable new community and help support existing community facilities within the area, providing new housing, employment, public open space, community facilities and a high quality, landscaped environment
- The provision of new employment space and a potential new hotel, supports the economy of the Borough and helps balance the needs of the community, local tourism and local business
- The proposals enhance recreation and provide new recreational routes (pedestrian, cycle and horse) linking Merrow and the North Downs
- The site is contained and forms a natural urban extension that is well defined and presents a strong urban edge, which will ensure that their development will not harm the purpose or openness of the wider Green Belt
- The developable area of the site as identified within the illustrative masterplan is not constrained by any other sensitive planning designations
- The site is not subject to significant infrastructure or environmental constraint and is deliverable within the first period of the plan, providing between 150-200 homes each year and being complete within between 5 and 7 years
- The proposals maintain a landscaped buffer with existing housing, so protecting the amenities of the adjoining properties and providing enhanced recreational routes, through new footpaths and open space
- Enhances nature conservation through new meadow, woodland planting and associated habitats and protects existing designated sites. Part of the site is within the Special Protection Area and appropriate SANG delivery would be discussed with the Council and could include on or off site delivery or any necessary payments to assist existing identified projects.
- Provides for low carbon, sustainable living, tackling the effects of climate change.
- The site is not subject to access, flood risk, nature conservation or other overriding constraints.

The proposals are therefore commended to the Borough Council as part of the assessment of the Submission Local Plan.

**Sustainability Appraisal**
Given the failings in the assessment of the land forming part of these representations in the Sustainability Appraisal that accompanied the Green Belt and Countryside Study, we would question the sustainability appraisal that accompanies the Plan. This has not adequately considered the most sustainable spatial strategy for the Borough in line with the NPPF which would focus growth on sustainable locations within and urban extensions around Guildford first.

It is essential for the sustainability appraisal to be recast using a hierarchy approach to the definition of settlements and the resulting sustainability of sites identified and ranked according to accessibility to goods and services and to the main centres of population. This should also take account of the need to tackle the effects of climate changes and minimise the need to travel, while maximising the opportunities for people to use walking, cycling and means of transport other than the car.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
10) I OBJECT TO lack of evidence to the need for more housing in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/216  Respondent: 15150913 / Peter Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The failure of GBC to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the Local Plan is exaggerated. If the population is to grow by some 20,000 in the Plan period, 8,000 homes would be needed based on an average of 2.5 persons per home. The Green Belt does not need to be built over and half of new homes could be built on brownfield sites. It appears that GBC’s Transport Assessment was not even available to councillors for the vote taken on 24th May and this was only published on 6th June with infrastructure overload receiving scant attention.

None of these proposals are in the best interests of Send and its residents and any change to its Green Belt status would greatly diminish the character and identity of the village. In addition, the general strain on the infrastructure of the village in terms of roads, schooling and medical services would be overwhelming. Already in Send, traffic is heavy at certain times of day, schools over-subscribed and The Villages Medical Centre struggles to provide timely appointments for the residents currently registered.

I trust these objections are received and noted in accordance with procedure and look forward to news arising from the reassessment which will surely be necessary once the full extent of the resistance of local residents to the Local Plan proposals is known to GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/210  Respondent: 15151009 / G Stonehouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016). And these are my reasons:

1. I object to the number of houses needed. After the EU referendum I do not believe the proposed housing numbers are still valid. I would like to see a revision to these numbers for the Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I strongly object to the Guildford Borough Proposed Submission Local Plan (June 2016). And these are my reasons:

1. I object to the number of houses needed. After the EU referendum I do not believe the proposed housing numbers are still valid. I would like to see a revision to these numbers for the Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

8.) The figure of 693 houses per annum in the Borough being too high.(Appendix D)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

8.) The figure of 693 houses per annum in the Borough being too high.(Appendix D)
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<td>1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)</td>
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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are 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:**
1. I object to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/257  Respondent: 15159905 / Vicky Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT TO THE LACK OF EVIDENCE FOR THE ALLEGED HOUSING NEED NUMBERS

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/261  Respondent: 15160769 / Elliott Stuart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object to the 2016 Local Draft Plan

I wish to record my strong objections to the Draft local Plan which is out for public consultation currently.

I live in West Horsley and I am aged 13. My family moved to this area because we did not wish to live in an urban location (like Guildford itself) - we like the countryside with its open, green spaces.

We have learned at school about the Green Belt which I think should be protected from erosion by possible future disproportionate development - I don't think that you have even done a full survey to get proper evidence of the local housing need.

Please note that I object, very strongly, to the following:

lack of evidence of the housing need in the borough;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Strategic Housing Market Assessment. SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

These figures are at odds with figures used previously @ 322

As this figure cannot be verified, the lack of transparency is not right for consultation on the Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the lack of any evidence of the alleged housing need numbers. (S2)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
6) lack of evidence for housing numbers needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/404  Respondent: 15180193 / Paul Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.) I object to the provision of sound evidence. The reduction in ELNA of 80% since the 2013 survey means that the need for industrial space at Burntcommon is no longer present.

7.) I object to the situation being labelled as “exceptional”. There is nothing exceptional about the current situation, and if anything, the Brexit vote should put all development on hold until its impact can be fully assessed. The demand for housing may fall if there is a resulting reversal in immigration trends, and foreign student choosing to come to the UK, for example.

8.) I further object (following on) to the plans being based on insufficient evidence of future housing needs. Again, with reference to the huge potential of the Brexit decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/334  Respondent: 15184289 / V H Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the strategic Housing Market SHMA figure of 693 houses per annum in the borough [text unreadable].

I trust that the objections made above are fully taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/335  Respondent: 15185537 / Peter Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

F. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/350  Respondent: 15189377 / Anne Butler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I do not believe GBC has provided sufficient evidence for its stated house numbers. The increase appears to be at odds with the numbers given by the ONS and population growth projections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/353  Respondent: 15192257 / Jennifer Cliff  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the sufficient evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2003  Respondent: 15195617 / Scott Brownrigg Planning (Natalie Walter)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Subject: Proposed Submission Local Plan Consultation (June 2016)

I write on behalf of our client in relation to "Guildford Borough Proposed Submission Local Plan: Strategy and Sites," published for consultation on 5th June 2016. Our client is the landowner of "Land at Hornhatch Farm, Chilworth."

Background

The site known as "Land at Hornhatch Farm, Chilworth" was proposed for removal from the Green Belt and allocation as a potential development site in the "Draft Guildford Borough Local Plan: Strategy and Sites" (July 2014) (site allocation no.68). This was following consideration of the contribution of the site to the main purposes of the Green Belt; its location adjoining an inset settlement; the need for defensible boundaries; and deliverability considerations.
This potential development site has since been removed in the "Guildford Borough Proposed Submission Local Plan" (June 2016) ["the proposed submission local plan"].

Case for Retention in Forthcoming Local Plan

Our client objects to the removal of former site allocation 68 from the proposed submission local plan for the reasons set out below.

Need for Housing

Guildford Borough is currently not meeting its' housing requirements. The 2014-15 Annual Monitoring Report sets out on page 9 that Guildford had a 1.4-year supply of housing. It further states on page 11:

"We are not currently able to demonstrate a five year supply of deliverable housing land without amendments to Green Belt boundaries and use of countryside land (against objectively assessed housing need of 693 homes a year)."

This is again acknowledged in paragraph 4 of the decision letter for appeal reference APP/Y3615/W/15/3132375, which states:

"The Council indicate that it cannot demonstrate a five year supply of housing land."

West Surrey Strategic Housing Market Assessment (2015) identifies that there is a need for a mix of house sizes across the housing market area as identified in Table 8.

In respect of the strategy put forward in the proposed submission local plan to deliver housing, the Council are placing undue reliance on Policy A35: "Land at former Wisley airfield, Ockham." This site is proposed for allocation for the delivery of 2,000 homes. This one site is proposed to contribute up to 14% of the housing required over the plan period.

Our client considers that significant uncertainties exist in respect of the delivery of the Wisley airfield site and that this strategy is therefore unsound.

In addition, a planning application for the site proposed in Policy A7: "Land and buildings at Guildford railway station, Guildford" (planning application reference: 14/P/02168) was refused on 30th June 2016. This potential allocation includes redevelopment for approximately 350 homes. Our client considers that uncertainty exists over the delivery of this and other potential previously-developed sites thereby meaning the proposed number of homes to be delivered in the plan as set out in Policy S2 is unlikely to be met.

Further consideration should therefore be given to the delivery of smaller, sustainable sites, such as "Land at Hornhatch Farm."

Lack of Justification for Removal of Site

"Land at Hornhatch Farm" was included as a potential development site in the "Draft Guildford Borough Local Plan: Strategy and Sites" (July 2014). The reasons given for its omission from the proposed submission local plan are:

"Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt."
Our client considers that the justification for the site's exclusion is based on subjective qualitative methodology used to assess the Green Belt, which has only been published for consultation at a late stage in the plan-making process. The forthcoming plan has therefore not been prepared in the light of a robust evidence base.

**Sustainability**

Allocation of "Land at Hornhatch Farm" would form a sustainable extension to Chilworth. The site was previously assessed in the 2014 "Draft Guildford Borough Local Plan: Strategy and Sites" as suitable for residential development within one to five years. The site is located in Environment Agency Flood Zone 1 (low risk of fluvial flooding) and is within 5 to 7km of the Thames Basin Heaths Special Protection Area (SPA) and therefore is beyond the zone of influence of this SPA.

**Green Belt Considerations**

Paragraph 89 of the National Planning Policy Framework (NPPF) states that local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It also sets out that authorities should consider Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Our client considers that there is a clear case for removal of the site from the Green Belt and its retention as a site allocation for residential development. The site would have clearly defined boundaries as required by paragraph 85 of the NPPF. Our client notes that additions to the Green Belt are proposed to be made elsewhere in Guildford Borough. This approach is supported.

**Deliverability**

The site is within single ownership, is available now and development would be achievable in the short to medium term.

**Conclusions**

Land known as "Land at Hornhatch Farm" should be retained as an allocation for residential development in the Guildford Borough Submission Local Plan: Strategy and Sites.

Guildford Borough is not currently meeting housing delivery requirements and the strategy put forward in Policy S2 is unsound due to an overreliance on particular site allocations, such as Policy A35 : "Land at former Wisley airfield, Ockham."

A lack of justification has been provided for the removal of "Land at Hornhatch Farm" from the spatial strategy and there has been a lack of proper consultation on the "Green Belt Sensitivity Map."

Allocation of the site for residential use would have the benefit of bringing forward a deliverable sustainable extension to Chilworth that would contribute to providing much-needed housing in Guildford Borough.

I trust that this letter is clear but please do not hesitate to contact me if you have any questions or queries.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For the West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/402  Respondent: 15198337 / Jack Tallick  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)  

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.  

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:  

Comment ID: PSLPA16/403  Respondent: 15198401 / Tony Porter  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  

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 any evidence for the alleged housing need numbers.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:  

Comment ID: PSLPA16/413  Respondent: 15205569 / Mark Gurdon  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

1. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:  

Comment ID: PSLPA16/426  Respondent: 15205729 / John Walker  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D).

The Plan's proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on 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:** PSLPA16/418  **Respondent:** 15205921 / Elizabeth Howlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. A better alternative would be to blocks of build bed sits in Guildford for single occupancy to house the thousands of immigrants seeking work in the UK.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/423  **Respondent:** 15206497 / Vivien Bancroft  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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 failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/428  **Respondent:** 15206721 / Beverly Saidman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. 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.
10) I OBJECT TO the lack of evidence for the alleged housing need numbers

2) Evidence

GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means the industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. 50% of new homes needed could be built on brownfield sites. GBC's Transport Assessment was not even available to councillors for the vote taken on 24th May, being published on 6th June. Infrastructure overload has received scant attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
10) I OBJECT TO the lack of evidence for the alleged housing need numbers

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D) The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I also object to the Borough Wide Strategy (Policy S2) GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the lack of any evidence for the alleged housing need numbers

Nowhere in the Plan document can I find an explanation for why new houses need to be built other than the obvious that there are too many people. GBC should not punish local residents for the errors of central government in controlling population growth. Its residents will applaud GBC for standing up to central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

16. We object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is we believe inaccurate; it inflates the needs of the borough by distorted student numbers.
This figure is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. **This is not democratic and is not appropriate for consultation** of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

We both trust that the objections made above are fully taken into consideration and that the Plan shall be amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/472  **Respondent:** 15220321 / K P Buchanan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the Plan as it is based on flawed statistics using unreliable evidence to exaggerate the housing and industrial needs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/483  **Respondent:** 15227329 / Sharon Pask  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/490  **Respondent:** 15227585 / Kelly Bartlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/491  Respondent: 15227617 / James Pask  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/541  Respondent: 15227617 / James Pask  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/492  Respondent: 15227905 / Nigel Alexander  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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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<td>The number of new houses it is suggested need to be built cannot be justified.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2507  Respondent: 15238049 / Glenda Charlick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers.

Please be the responsible Guardians of our future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/550  Respondent: 15238881 / Stephen John Tully  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the complete lack of evidence for the alleged housing needs numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/559  Respondent: 15239297 / T Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/556  Respondent: 15239425 / Debbie Preece  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/568  
Respondent: 15240161 / R O Moore  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

9. The Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough. This is more than double the figure of 322 used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1549  
Respondent: 15241185 / Jill Gooding  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) 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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2579  
Respondent: 15241185 / Jill Gooding  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/589  
Respondent: 15245697 / Justine Butler  
Agent:
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<th>Comment ID: PSLPA16/598</th>
<th>Respondent: 15246497 / G F Bennett</th>
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<th>Comment ID: PSLPA16/603</th>
<th>Respondent: 15248321 / Gordon Pipe</th>
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<td>3) I again most strongly object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).</td>
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9. I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
With the recent Vote to Leave the EU, housing soon won't be an issue with 2.9 Million people leaving.

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. How's that suddenly doubled????

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are 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:
4) I object to the SHMA housing figures – they are too high

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/635  **Respondent:** 15254113 / R Orchard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/623  **Respondent:** 15254305 / Ben Barnwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) 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.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/3363  **Respondent:** 15254337 / Ben Warwick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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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 the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/634  Respondent: 15254785 / M.D. Vickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.

° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.30 Whilst the SA states that the preferred approach “performs well” (including ‘Land to the south of Normandy and north of Flexford’ (Policy A46)) in terms of potential housing provision across the plan period because “there is a reliance on smaller sites at villages partly because these sites are ‘deliverable’” a review of the housing trajectory in the LAA does not demonstrate this.

1.31 Our client’s site could deliver around 70 houses within the first five years of the plan period to contribute to meeting the extensive needs which exist within this area as well as within the Borough as a whole to contribute to ensuring the soundness of the plan.

1.32 With regards to the site options appraisal findings set out in Table C of Appendix IV of the SA it is noted that the spreadsheet which supports this Table was not made available until 11/07/2016 following a request made to the Council. This information was not therefore available for the full six week consultation period.

1.33 Nonetheless from an initial review of Table C it is apparent that based on the ranking exercise undertaken by the Council in the SA that the site allocated in the Local Plan under Policy A43 (Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley) does in fact have the poorest performance of all of the sites assessed in relation to Send.

1.34 Furthermore if the performance of this allocated site is also compared to the sites considered in respect of Send Marsh as well it remains the poorest performing site with a total of ten indicators being scored as red which equates to 48% of the overall criteria.

1.35 The spreadsheet which accompanies Table C on which the ranking exercise for the SA has been based is also inaccurate in many places in relation to our client’s site. Key areas of concern are set out below:

1.36 Flood risk - ‘Land north of Send Marsh’ is stated as being in Flood Zone 3 and therefore given a red ranking against flood risk in the site options appraisal. The Council was originally presented with evidence in September 2014 to demonstrate that the site is not at risk of flooding and this ranking is therefore incorrect. The entire development can be delivered without encroaching into any areas liable to flooding, and this site should rightly score a green ranking against flooding and not a red ranking.

1.37 Previously developed land - In addition we have also submitted a ‘Previously Developed Status of Land’ report in February 2016 which concludes that there “is no evidence of the site ever being agricultural use in recent times” and provides significant evidence “to support the case for the site being Previously Developed Land.” This category should also score a green ranking and not a red ranking.

1.38 In order to minimise any potential for legal challenge to the Local Plan process, it is recommended that the SA is updated to take the above points into consideration and ensure the soundness of the plan.

1.39 With the correct scoring, it is apparent that ‘Land north of Send Marsh’ performs strongly when assessed against the 21 categories the Council have opted to appraise all reasonable site options against.

1.40 In order to minimise any potential for legal challenge to the Local Plan process, it is recommended that the SA is updated to take the above points into consideration and demonstrate how all reasonable alternatives have been considered in order to ensure the soundness of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2.1 These representations have been prepared in response to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2016. This report takes into account earlier representations, as relevant, made to the Council in response to consultation on the emerging Local Plan and its supporting evidence base.

2.2 Trenfold Property Limited and Countryside Properties UK Limited, whom Boyer is representing, control a parcel of land at Polesden Lane and Send Marsh Road, Send Marsh. Countryside Properties are a contractual purchaser for the site and are able to deliver this site early in the plan period. A Site Location Plan is attached at Appendix One.

2.3 Land at Polesden Lane and Send Marsh Road, Send Marsh is a 2.6ha site enclosed on three sides by existing residential properties. It currently comprises scrub grassland together with the spoil and hardstandings associated with its previous uses.

2.4 The site is broadly level and featureless with no significant vegetation other than on its boundaries. The site benefits from a vehicular access from Danesfield which is suitable to serve a development of up to 70 dwellings. These 70 dwellings can be delivered without encroaching onto land liable to flooding.

2.5 Odyssey Markides have prepared a Highways Statement which is appended to this statement at Appendix Two, which demonstrates that a residential development of up to 70 dwellings would be deliverable and acceptable in respect of transport issues.

2.6 This report firstly addresses the National policy context, followed by a summary of the background position and then provides a response to the overall strategy, approach to the Green Belt, previously developed land and settlement boundary of villages. It then provides a response to the proposed allocated sites, considers the sustainability appraisal and detailed policy matters and finally draws the representation to a summary and conclusion.

2.7 This report is submitted for consideration in the preparation of the Guildford Borough Proposed Submission Local Plan: Strategy and Sites, June 2016.

2.8 Guildford appears to have embraced national Government Advice, made clear within the Housing and Planning Act, to ensure that Local Plans are put into place as quickly as possible in order to facilitate much needed strategically planned growth. In this regard, Guildford’s commitment to progressing their Local Plan in line with Government Advice and the Housing and Planning Act is supported.

2.9 This commitment to progressing their Local Plan is demonstrated by the fact that Guildford has now progressed to a Regulation 19 consultation, which is also welcomed.

2.10 The proposed settlement hierarchy for the Borough’s settlements is also supported as set out in the ‘Guildford Borough Settlement hierarchy’ which forms part of the evidence base for the Proposed Submission Local Plan: Strategy and Sites June 2016.

2.11 As set out in section 4.0 of the document entitled, ‘Guildford Borough Settlement Hierarchy’, (which refers to the ‘updated settlement hierarchy’), the sustainability ranking of the settlements designates Send Marsh/Burntcommon as a large village. Large villages are defined in the settlement hierarchy as being “unsuitable for substantial growth but capable of accommodating a proportionate extension.”

2.12 The conclusions state that “it would be appropriate to direct new development towards…Send Marsh/ Burntcommon” and other locations within the Borough which are considered to be “the most sustainable in terms of their level of community services and facilities, access to higher order centres and employment opportunities, and ability to support new development.”

2.13 This approach and the conclusions in relation to Send Marsh within the ‘Guildford Borough Settlement hierarchy’ are supported.

3.1 This section provides a brief review of the approach which local planning authorities are required to take in preparing Local Plans for their areas, with particular reference to planning for their identified housing requirements.
3.2 Published in March 2012, the National Planning Policy Framework (NPPF) provides the overarching Government policy document in relation to planning.

3.3 The NPPF requires Local Plans to be “prepared with the objective of contributing to the achievement of sustainable development” (paragraph 151). As such paragraph 154 states that Local Plans “should address the spatial implications of economic, social and environmental change”. They should set out “the opportunities for development and clear policies on what will or will not be permitted and where”.

3.4 Local Plans should be drawn up over an appropriate timescale. Preferably this will involve a 15-year time horizon but also taking into account longer term requirements.

3.5 The NPPF establishes the ‘presumption in favour of sustainable development’ in paragraph 14, which in particular for plan-making means that:

“Local planning authorities should positively seek opportunities to meet the development needs of their area.”

Housing Provision

3.6 One of the key objectives of the NPPF, set out in para. 47, is to “boost significantly the supply of housing”. In order to achieve this aim, the Local Planning Authority should:

"Use their evidence-base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.”

Delivering a wide choice of high quality homes

3.7 The Government’s ambition is to boost significantly the supply of housing. Paragraph 47 of the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements, with an additional 5% to 20% buffer depending on past performance of delivery. Local planning authorities need to provide a realistic prospect of achieving planned supply and to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and where possible for years 11-15.

3.8 In addition paragraph 17 states that every effort should be made objectively to identify and then meet the housing needs of the area. Local Planning Authorities are required to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

3.9 Paragraph 50 of the NPPF deals with the need to deliver a wide choice of high quality housing, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It sets out three specific points. The first is to plan for a mix of housing based on current and future demographic trends and needs of different groups. The second point is for a Local Authority to identify size, type and tenure as well as the range of housing required in particular locations reflecting local demand. The last point is where affordable housing is required, to set policies for meeting that need on site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4310  Respondent: 15256225 / Boyer (Michelle Thomson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

National Position
4.1 Housing and Planning Act and streamlining the planning process

4.2 The objective of the Act is to assist the Government in improving UK housing provision by setting out a number of reforms to assist in the delivery of new homes and to address current issues which are delaying the process.

4.3 The Housing and Planning Bill received Royal Assent on 12 May 2016. Sections 143 to 146 bring in new powers for the secretary of state to intervene in plan-making, reflecting the government’s commitment for all planning authorities to produce a local plan by early 2017.

4.4 On 18th February 2016 the Government published a ‘Technical Consultation on Implementation of Planning Changes’. (The consultation ran until 15 April 2016). The consultation document confirms the intention of the Government to take action to get plans in place and ensure plans have up-to-date policies by:

- Publishing league tables, setting out local authorities’ progress on their local plans;
- Intervening where no local plan has been produced by early 2017, to arrange for the plan to be written, in consultation with local people, to accelerate production of a local plan; and
- Establish a new delivery test on local authorities, to ensure delivery against the number of homes set out in local plans.

Local Position

4.5 The West Surrey Strategic Housing Market Assessment covering Guildford, Waverley and Woking Borough Council’s Final Report dated September 2014 was released into the public domain on Friday 2nd October 2015.

4.6 Paragraph 10.37 of this document set out that, ‘Taking these factors into account the SHMA draws the following conclusions on the overall need for housing over the 2013-33 period: Guildford: 693 homes pa.’

4.7 Prior to this publication, there were various estimates of housing need for Guildford Borough.

4.8 Paragraph 8.24 of the Guildford and West Surrey Strategic Housing Market Assessment Final Draft Report published in May 2014 sets out that, ‘On the balance of the evidence, we would recommend that the Council tests the ability to deliver up to 780 homes per annum within the borough over the plan period to 2031… The additional uplift from 652 to 780 homes per annum would be sufficient to support improvements in affordability; and to make a tangible difference to meeting affordable housing needs…’

4.9 The West Surrey Strategic Housing Market Assessment Summary Report published in December 2014 then set out at paragraph 2.24 that, ‘the SHMA draws the following draft conclusions on the overall needs for housing: Guildford – 620 – 816 homes pa.

4.10 The current need of 693 therefore appears to be a low ‘mid-range point’ of the need referred to in previous iterations of the SHMA.

Local Plan Review

4.11 Guildford Borough consulted on the Draft Local Plan from July to September 2014. This was a consultation under Regulation 18 of the Town and Country Planning (Local Planning ((England) Regulations 2012.)

4.12 In the foreword statement to the Draft Local Plan June 2014 by Councillor Stephen Mansbridge, (the then Leader of the Council), it was suggested that, ‘To ignore or dismiss the borough’s need for more housing and employment land would be a destructive and dangerous strategy that would do great harm to the place that we all cherish. In total this plan will take up 2 per cent of green belt land…The Plan has to take into account our persistent under delivery of housing in past years and the almost complete absence of a 1-5 years land supply.’

4.13 Policy 2: Borough Wide Strategy of the June 2014 Plan set out that, ‘During the plan period (2011-31), we will make provision for 13,040 new homes, which equates to an annual requirement of 652 new homes a year… In order to provide a level of flexibility and to ensure that the realigned green belt boundaries endure beyond the plan period, we are safeguarding approximately 99 hectares of land. ’ As highlighted in the supporting text to the policy, it is recognised that this annual requirement represents a significant increase over the previous Local Plan requirement.
4.14 At that time, the Council’s proposed housing target had been informed by the draft Strategic Housing Market Assessment (SHMA) (January 2014). Notably the SHMA recommended that the Council tested the ability to deliver up to 780 new homes per annum over the period to 2031.

4.15 It is also notable that the Council’s selected housing target at that time was at the bottom level of the scenarios assessed in the SHMA. Para 8.24 of the SHMA set out that, ‘The additional uplift from 652 to 780 homes per annum would be sufficient to support improvements in affordability; and to make a tangible difference to meeting affordable housing needs (although not fully meeting it, this would require a further uplift) as well as meeting the baseline demographic growth in the Borough.’

4.16 Against this backdrop to the housing numbers and policy, ‘Land at Polesden Lane and Send Marsh Road, Send Marsh’ (the site the subject of this representation) was identified in the draft Guildford Borough Local Plan as Site 120, which was proposed to be safeguarded for development beyond the plan period.

Green Belt Review

4.17 A Guildford Borough Green Belt and Countryside Study (GBCS) was published in February 2013. This Green Belt and Countryside Study included the site, the subject of this report as area B16-A. The GBCS identifies this site as suitable for residential development if sufficient deliverable land outside of the green belt is not identified. The GBCS concluded the following in relation to the site:

‘B16-A is surrounded by defensible boundaries with partial visual enclosure including tree cover following ditch and residential gardens at Danesfield to the north and east; residential gardens following Polesden Lane and Send Marsh Road to the south; and tree belts with open farmland to the west, B16-A is relatively unconstrained in environmental capacity terms, however, it is partly located within a designed flood risk area to the north west. B16-A scored 6 and was ranked 22nd according to current sustainability credentials. The estimated residential development capacity of B16-A is 47 dwellings.’

Local Development Scheme

4.18 On 29th September 2015, a formal timetable (Local Development Scheme) for the production of a Local Plan, Development Management Policies and production of the Community Infrastructure Levy (CIL) was considered at an Executive meeting of the Council. The LDS was supported by an Executive Report.

4.19 Of particular note was the discussion of a Regulation 18/ Regulation 19 consultation stage in taking the Local Plan forward.

4.20 Statutory instrument 2012 No. 767 sets out The Town and Country Planning (Local Planning) (England) Regulations 2012. This includes Regulation 18 and Regulation 19. Regulation 18 refers to the bodies and persons to be notified at the stage of preparation of the local plan about the subject of a local plan and inviting representations to the local planning authority about what a local plan ought to contain. Regulation 19 refers to the publication of a local plan and what should happen prior to submitting a local plan to the Secretary of State.

4.21 It is therefore clear that the Regulation 18 requirements must be met and complied with prior to proceeding to the Regulation 19 requirements.

4.22 A Regulation 18 consultation is recognised as providing the earlier opportunity to engage in the plan making process with greater flexibility to influence the Local Plan (including policies, housing numbers and allocations). The Regulation 19 consultation is the Publication Stage where the Council is setting out their intended direction with more certainty and therefore considered by many to offer reduced scope for variation.

4.23 There have previously been two Regulation 18 consultations; the Issues and Options consultation in October to November 2013 and the draft Local Plan consultation in July to September 2014.

4.24 Paragraph 5.5 of the Executive Report for the Guildford Borough Local Plan: Local Development Scheme set out that, ‘A legal opinion has been sought on this matter to ensure that the approach taken meets the requirements set by the
regulations and can be robustly defended at examination. The advice received is that it would be advisable to proceed straight to Regulation 19 stage for a number of reasons:

- It would make progress towards the goal of achieving a plan.
- The risks can be ameliorated by, if necessary, repeating the Regulation 19 consultation.
- There is a strong argument that the two rounds of consultation already comply with the requirements of Regulation 18.

4.25 Given the pressing need to prepare a sound new Local Plan as quickly as possible and in light of the legal advice received, Guildford Borough Council has progressed straight to a Regulation 19 consultation.

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: PSLPA16/4311</th>
<th>Respondent: 15256225 / Boyer (Michelle Thomson)</th>
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Background to Previously Developed Land

7.1 The Glossary at Annex 2 of the NPPF sets out the definition of previously developed land as follows: ‘Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.’

Approach at Guildford

7.2 Paragraph 4.29 of the Topic paper: Green Belt and the Countryside June 2016 sets out that, ‘Whilst not villages, a similar approach is applicable to major previously developed sites in relation to whether they should remain washed over or be inset from the Green Belt. National policy requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt. If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt. We consider that this constitutes the exceptional circumstances required to amend the Green Belt boundary to inset these sites.’

7.3 Paragraph 5.6 and 5.7 of the Green Belt and the Countryside Topic Paper list the sites considered to be previously developed and inset from the Green Belt, setting out that, ‘The following major previously developed sites are proposed to be inset from the Green Belt: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute and the University of Law Guildford.’

7.4 ‘The following traveller sites are proposed to be inset from the Green Belt: Land at Cobbettos Close, Normandy; Land at The Paddocks, Rose Lane, Ripley; Four Acres Stable, Normandy; Land rear of Roundabout, Wood Street Village; The Orchard, Puttenham; Valley Park Equestrian Centre, Shalford; Land rear of Palm House Nurseries, Normandy; Whittles Drive, Normandy.’

7.5 The broad approach to removing major previously developed sites from the Green Belt accords with national planning policy and is supported. However, the evidence base to support Guildford’s assumptions about the sites considered to be previously developed appears to be somewhat lacking. There are no details as to the methodology or reasoned justification that has been applied to demonstrate that a site should be considered as previously developed land.
7.6 The DCLG, ‘Technical consultation on implementation of planning changes’ covers ‘identifying brownfield land that is suitable for housing.’ Whilst at consultation stage and not implemented, this document provides the an indication of the direction of travel.

7.7 Paragraph 3.13 sets out that, ‘Brownfield or previously developed land is defined in Annex 2 of the National Planning Policy Framework. Sites on brownfield registers will be required to meet this definition of previously developed land. This is a very broad definition and, apart from the exclusions, covers all land in England where there are or have been buildings or other development. Much of this land is already in productive use and would not be suitable for new housing.’

7.8 Paragraph 3.16 then sets out that, ‘Authorities should adopt a positive, proactive approach and consider both large and small sites. They should only reject potential sites if they can demonstrate that there is no realistic prospect of sites being suitable for new housing.’

7.9 Paragraph 3.17 of this consultation document is also relevant, which sets out that, ‘To be regarded as suitable for housing our proposed criteria are that sites must be:

- Available…
- Capable of supporting five or more dwellings or more than 0.25 hectares…
- Capable of development. Local authorities should ensure that sites are suitable for residential use and free from constraints that cannot be mitigated…’

7.10 Paragraph 3.23 then addresses publicity and consultation requirements and sets out that, ‘A key purpose of brownfield registers is to provide transparent information about suitable sites to local communities, developers and others. We propose that information about potentially suitable sites should be available at local authority offices and online. Once local authorities have considered representations on their proposed list of sites, we will encourage them to publicise their decisions, including reasons why sites have or have not been granted permission in principle.’

7.11 It is clear that Guildford’s published evidence base does not address the majority of these points. Indeed, assumptions appear to have been made about whether land is previously developed and these assumptions have not been made public. It appears that these assumptions result in different conclusions about what is considered to be PDL than the definition as set out in the NPPF and proposed to be used by DCLG in the Technical Consultation.

7.12 In the absence of any evidence base being produced by Guildford Borough Council, specific and detailed evidence demonstrating the case for concluding that the site at Send Marsh should be considered to be previously developed land (PDL) was submitted to Guildford Borough Council in February 2016. This report is entitled, ‘Land at Polesden Lane and Send Marsh Road, Send Marsh, Previously Developed Status of Land’ and is attached again at Appendix Four to this representation.

7.13 The February 2016 report at Appendix Four concluded with the words that it had been prepared ‘specifically to correct the description of the site as pasture land’ and additionally as set out at paragraph 1.5 of the report in response to the fact that, ‘The Local Planning Authority now has a requirement to produce and maintain a register of previously developed land within its administrative area.’

7.14 In addition to the evidence of previous development set out in that report, it highlighted that, ‘There is no evidence of the site ever being in agricultural use in recent times. It is in the hands of a house builder and therefore it can be delivered without delay.

‘The site can be developed using land only in Flood Zone 1, i.e. avoiding any land within Flood Zone 2 or 3. Significant evidence has been provided to support the case for the site being Previously Developed Land. The site has been occupied by permanent non-agricultural structures for much of the Twentieth Century. The remains of these structures are still visible on site and the findings of the Geo-Technical assessment lends further support to the existence of foundations to the extent that these have not fully blended into the landscape.’
‘It is considered that because of the history of previous uses of the site that it is to be regarded as Previously Developed Land, which increases its suitability for residential development. Other than the existing Green Belt designation, there are no other overriding constraints to the site which would prevent its early release for development.’

7.15 The above also demonstrates that the approach adopted by Guildford conflicts with DCLG’s proposed approach that, ‘They should only reject potential sites if they can demonstrate that there is no realistic prospect of sites being suitable for new housing.’

7.16 The Guildford Borough Land Availability Assessment (LAA) dated February 2016 considers the site at page 543 within the table entitled ‘Discounted sites – housing’. This document gives the site ID reference 1221, ‘Land at Polesden Lane and Send Marsh Road, Send’. The supporting text sets out, ‘Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.’ Guildford has produced one table entitled ‘Previously Developed Land in the Green Belt, Discounted sites (housing)’ and a second table entitled ‘Green Belt, Discounted sites (housing). As the site is listed under the latter table, it is clear that the Council has concluded that the site is not considered to be previously developed land.

7.17 Although there is a statement at the end of the document setting out that, ‘…if there is information about additional previously developed land in Guildford borough that would help us to update this LAA, we would be grateful to receive it’, it does not appear that information previously sent to the Council has informed that evidence base and latest documents.

7.18 The case to support the removal of the site from the Green Belt has been clearly established above. This identifies the weaknesses within the methodology adopted by the Council and particularly our Green Belt Assessment originally submitted to the Council in February 2016, see Appendix Three which has informed their Green Belt Assessment.

7.19 Our Green Belt Assessment at Appendix Three has clearly demonstrated that our site, ‘at best, makes only a very limited contribution to the purposes of including land within the Green Belt.’ In accordance with the direction referred to at paragraph 6.8 above, by revising the evidence base to justify the release of land within the Green Belt, and adopting the approach as advised, which accords with both PAS guidance and best practice, it is clear, as robustly demonstrated by our Green Belt Assessment that the site at Send Marsh should be removed from Green Belt.

7.20 It has therefore been clearly demonstrated that 1) the site should be removed from the Green Belt and 2) the evidence presented demonstrates that the site should be considered previously developed land in accordance with the definition within the NPPF and subsequently proposed to be taken forward to inform the brownfield register.

7.21 Following Ministerial Guidelines it is therefore of fundamental importance that the Council demonstrates that the proposed approach with regards to both Green Belt and subsequently previously developed land in the Green Belt is supported by a robust evidence base in order to demonstrate it has appropriately considered all reasonable alternatives to ensure the plan and policies P2: ‘Green Belt’ and D4: ‘Development in urban areas and inset villages’ are sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Overview of the Sustainability Appraisal

10.1 The Sustainability Appraisal (SA) of the Guildford Borough Local Plan (June 2016) forms part of the evidence base for the emerging Local Plan and is described as a “mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives.”

10.2 In paragraph 5.1.5 the SA sets out that although there are a wide range of issues covered by the emerging Local Plan “the key issue/objective relates to the allocation of land to meet housing needs.” The SA therefore focuses on this issue and sets out to provide an appraisal of the alternative spatial strategies and reasonable alternatives available.

Housing Growth in Villages

10.3 In keeping with the ‘Guildford borough Settlement hierarchy’ the SA identifies that although in line with the sequential approach, growth at Green Belt sites around the villages is the final location at which to deliver growth, nonetheless “significant growth around villages is necessary” and nil growth in these locations “is not a reasonable option as several sites do have merit”.

10.4 Whilst the hierarchical approach to the allocation of growth across the Borough is broadly supported it is clear that the terminology currently utilised to describe a number of sites in the SA would benefit from revision. In particular in terms of the SA it is apparent that the five sites listed as ‘givens’ in terms of Green Belt sites around the villages cannot be described as “broadly supported” or “relatively small scale”.

10.5 In particular ‘Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley’ (Policy A43) was not previously included in the Regulation 18 consultation and indeed was added to the draft plan at the point it was considered at the Extraordinary Council meeting for the emerging Local Plan.

10.6 It is therefore unclear how the SA can describe this site as being a ‘given’ owing to the fact it is “broadly supported” when this matter remains untested and will only be demonstrated through the Regulation 19 consultation process to which this report responds.

10.7 In addition it is also apparent that the proposed allocation at ‘Land to the south of Normandy and north of Flexford’ (Policy A46) which is a residential led mixed use development site for approximately 1,100 homes cannot be considered to be “small scale”.

10.8 ‘Land to the south of Normandy and north of Flexford’ (Policy A46) is an allocated site covering 67 ha which is described in Policy A46 as being the “creation of a sustainable and inclusive community that can meet its day to day needs within the community.” It is therefore apparent that this represents a significant strategic site which is to deliver approximately 8% of the Council’s OAN.

10.9 Given the size of this site and the need to ensure the soundness of the plan additional evidence supporting the assumptions set out in the SA that this site “will be deliverable in the early part of the plan period” should be produced. This should address the fact that the SA conflicts with the information presented in the Housing Trajectory. The SA should also be updated to reflect that this is not a “small scale” development.

Housing Delivery

10.10 The ‘Sustainability Appraisal (SA) of the Guildford Borough Local Plan’ “identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’”. In total the SA appraises a total of 8 separate spatial strategies which deliver varying levels of housing growth across the Borough including Option 1 which delivers the OAN with no buffer through to Option 8 which delivers the OAN plus a 34% buffer.

10.11 The Council’s preferred approach is Option 4 which represents the delivery of the OAN plus a 14% buffer. The Council notes that the incorporation of this buffer will ensure that Guildford’s OAN is met in practice and ensures that some resilience is built into the Local Plan.

10.12 This corresponds to the Housing Trajectory set out in the Land Availability Assessment (LAA) which demonstrates that the potential housing provision across the plan period is 15,844 homes.
10.13 Whilst the SA states that the preferred approach “performs well” in this regard because “there is a reliance on smaller sites at villages partly because these sites are ‘deliverable’” a review of the housing trajectory in the LAA does not demonstrate this.

10.14 The Housing Trajectory also illustrates that ‘Land to the south of Normandy and north of Flexford’ is not anticipated to deliver any housing before 2021/22.

10.15 Furthermore contrary to the assumptions set out in the SA the Housing Trajectory indicates that in the first five years of the plan period ‘Land to the south of Normandy and north of Flexford’ is only predicted to provide a total of 200 dwellings towards the potential housing provision figure within the Borough. The majority of the housing will be delivered in the later stages of the plan period with approximately 82% of the housing being delivered between 2023 to 2029 based on the trajectory provided in the LAA.

10.16 This therefore re-emphasises that this strategic site will not be able to deliver in the early part of the plan period, contradicting the position as currently set out in the SA.

10.17 Consideration should also be given to the significant infrastructure which is required in respect of ‘Land to the south of Normandy and north of Flexford’ (Policy A46) including a secondary school (up to eight form entry), a significant bus network, an off site cycle network and a bespoke SANG, resulting in likely delays to the delivery of this site. Furthermore Policy A46 also sets out a requirement for any development to address the potential highway performance issues which could otherwise result from the development.

10.18 Given the above requirements and the evidence set out in the LAA it is apparent that this site will not be deliverable in the early part of the plan period.

10.19 This again highlights the point made earlier in this representation in that, in order to ensure the soundness of the plan, there is a need to fill a gap in the early years in the plan period with sites where there is certainty that they can and will be delivered. This will ensure diversity of supply and ensure the plan accords with the requirements of paragraph 47 of the NPPF.

10.20 Our client’s site could deliver around 70 houses within the five years of the plan period to contribute to meeting the extensive needs which exist within this area as well as within the Borough as a whole.

Recommendations

10.21 The SA does to some extent acknowledge this “pressure to allocate sites that are able to deliver in the early plan period” and therefore considers the possibility of allocating additional village sites.

10.22 The SA identifies three sites at Send which “come into contention” owing to the fact that they are outside of the AONB and comprise of amber-rated Green Belt.

10.23 Given the ‘red rating’ of the land parcel in the Green Belt Sensitivity Assessment, Land at Polesden Lane and Send Marsh Road, Send Marsh is not included within the three sites that ‘come into contention’ in Send.

10.24 It is therefore clear that for such heavy reliance in the SA to be placed on the Green Belt Sensitivity Assessment re-emphasises the strong concerns raised above with regards to the Council’s Green Belt Assessment methodology. It results in an incomplete assessment of the reasonable alternatives.

10.25 As such in order for the emerging Local Plan to be found at sound at examination it is considered essential that the SA be updated following a revised Green Belt Assessment to feed into an updated Sensitivity Assessment, as set out above in Section 5 of this representation.

Sustainability Appraisal – Site Options Appraisal

10.26 With regards to the site options appraisal findings set out in Table C of Appendix IV of the SA it is noted that the spreadsheet which supports this Table was not made available until 11/07/2016 following a request made to the Council. This information was not therefore available for the full six week consultation period.
10.27 Given that this information is stated to allow for a much “more effective interrogation of the data” set out in the SA it forms an important part of the evidence base for the Local Plan.

10.28 As such we therefore reserve the right to submit further information in regards to the site options appraisal findings on the basis that the information was not publically available alongside all other consultation documents for the full six week consultation period.

10.29 Nonetheless from an initial review of Table C it is apparent that based on the ranking exercise undertaken by the Council in the SA that the site allocated in the Local Plan under Policy A43 (Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley) does in fact have the poorest performance of all of the sites assessed in relation to Send.

10.30 Furthermore if the performance of this allocated site is also compared to the sites considered in respect of Send Marsh as well it remains the poorest performing site with a total of ten indicators being scored as red which equates to 48% of the overall criteria.

10.31 The SA should therefore be revised to provide additional evidence to support the inclusion of this allocated site within the Local Plan and also to re-consider its status as a ‘given’. These revisions are considered necessary in order to ensure that the emerging Local Plan is found sound at examination.

Land at Polesden Lane, Send Marsh (Our client’s site)

10.32 Having received the spreadsheet which accompanies Table C it is also noted that the information on which the ranking exercise for the SA has been based is also inaccurate in many places in relation to our client’s site. Key areas of concern are set out below:

Flood risk

10.33 ‘Land north of Send Marsh’ is stated as being in Flood Zone 3 and the SA analysis is therefore inaccurate. As a result of this error the site is given a red ranking against flood risk in the site options appraisal. The Council has previously been presented with evidence to demonstrate that the site is not at risk of flooding and this ranking is therefore incorrect.

10.34 As long ago as September 2014 we submitted to the Council a report in response to the Draft Guildford Borough Local Plan: Strategy and Sites consultation, which demonstrated that Flood Zones 2 and 3 only affected the north western segment of the site and contained a plan indicating the greater part of the site which was not so affected. This report with all of the relevant information about flooding, is attached again at Appendix Five and demonstrates that the entire development can be delivered without encroaching into any areas liable to flooding.

10.35 On the basis that the entire development can be delivered without encroaching into any areas liable to flooding, this site should rightly score a green ranking against flooding and not a red ranking.

Previously developed land

10.36 In addition we have also submitted a ‘Previously Developed Status of Land’ report in February 2016 which concludes that there “is no evidence of the site ever being agricultural use in recent times” and provides significant evidence “to support the case for the site being Previously Developed Land.”

10.37 Based on the classifications set out in Table C and the accompanying spreadsheet it would appear that the Council has failed to take these representations and previously submitted information into account and no assessment of this evidence appears to have taken place.

10.38 On the basis that evidence has been presented to the Council demonstrating the previously developed nature of the site, this category should also score a green ranking and not a red ranking.

Site Comparison
10.39 In order to directly compare sites, the SA scoring must be compared by assigning a quantitative basis for the colour coding. If the same approach utilised by the Council to compare Options 1 – 8 in Table 7.1 of the SA is adopted then a green ranking is assigned a score of one, an amber ranking is assigned a score of two and a red ranking is assigned a score of three.

10.40 Sites with the greatest number of red rankings across the 21 categories each site is assessed against will therefore have the highest total score whilst sites with the greatest number of green rankings will have the lowest total score.

10.41 On the basis of the incorrect red ranking attributed to flood risk and previously developed land in the site options appraisal then the total score for ‘Land north of Send Marsh’ is 41. However once these errors are corrected and the flood risk and previously developed land categories are correctly assigned a green ranking and assigned a score of 1 then the total score for ‘Land north of Send Marsh’ is significantly reduced to 37.

10.42 If the scoring method outlined above is also applied to all sites within the SA, then ‘Land north of Send Marsh’ (i.e. our client’s site) ranks joint second out of all of the sites assessed in Send Marsh for housing use with a total of 11 green rankings.

10.43 It is therefore apparent that ‘Land north of Send Marsh’ performs strongly when assessed against the 21 categories the Council have opted to appraise all reasonable site options against.

10.44 In order to minimise any potential for legal challenge to the Local Plan process, it is recommended that the SA is updated to take the above points into consideration and demonstrate how all reasonable alternatives have been considered in order to ensure the soundness of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4313   Respondent: 15256225 / Boyer (Michelle Thomson)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

12.1 These representations have been prepared in response to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2016. This report has taken into account earlier representations, as relevant, made to the Council in response to consultation on the emerging Local Plan and its supporting evidence base.

12.2 Our client supports the aspirations of the Local Plan in terms of Guildford’s commitment to progress their Local Plan demonstrated through progressing to a Regulation 19 consultation

• Guildford’s commitment to meet their full objectively assessed housing need
• The acknowledgement that Green Belt releases are required to achieve this
• The approach to the settlement hierarchy
• The conclusion that Send Marsh is a ‘large village’ which is considered to be a sustainable location and appropriate to direct new development which represents a ‘proportionate extension’

12.3 It is however apparent that there are a number of outstanding issues which need to be addressed in order for the Plan to be found sound at examination. These points are highlighted below.
12.4 In particular these representations have identified that the Local Plan relies heavily on strategic sites to deliver the required housing during the plan period which makes the plan vulnerable. This is particularly the case given that six sites are being relied upon to deliver 66% of the overall OAN requirement in the late stages of the plan period.

12.5 The Plan should demonstrate a 5 year housing land supply at the point of adoption. Guildford Council’s proposed position will be that they will not be able to do so and consequently the plan is unlikely to be found sound on this basis without modification.

12.6 In order to ensure that the Local Plan is found sound at Examination we would therefore strongly recommend that the Council revises its housing trajectory to incorporate a greater number of smaller sites which can deliver in the earlier stages of the plan period thereby ensuring that the housing trajectory is robust and achievable.

12.7 Our client’s site could deliver both market and affordable housing within the first five years of the plan period to contribute to meeting the extensive needs which exist within this area as well as within the Borough as a whole at the start of the plan period.

Approach regarding Green Belt releases

12.8 The Green Belt releases to enable the Council to achieve their OAN are based on a Green Belt and Countryside Study. The Green Belt and Countryside Study prepared by the Council has significant limitations. These in summary relate to 1) The usage of a binary system to assess a site’s contribution to Green Belt purposes (with parcels scoring either a 1 or 0) without providing any quantification on the degree of that contribution and 2) as a result of the first limitation there is not the ability for any detailed form of ranking.

12.9 Boyer has therefore carried out an independent assessment of PDAs and MPDAs around Send/ Send Marsh. This assessment concludes that the site, at best, makes only a very limited contribution to the purposes of including land within the Green Belt.

12.10 In addition it has been demonstrated that the current Green Belt inset boundary as proposed fails to adhere to the NPPF in that it does not follow physical features that are readily recognisable and likely to be permanent (Paragraph 85). This appears to be as a result of incorrect assumptions made about the location of a tree belt and/or fence line to the west of the Danesfield.

12.11 The Green Belt boundary in this location should therefore be adjusted to remove our entire site from the Green Belt in order to ensure the soundness of the plan and policy P2: Green Belt.

Approach regarding Previously Developed Land

12.12 In the absence of any evidence base being produced by Guildford Borough Council, specific and detailed evidence demonstrating the case for concluding that the site at Send Marsh should be considered to be previously developed land (PDL) was submitted to Guildford Borough Council in February 2016.

12.13 The key points taken from the conclusion within this report set out that the report addressing the ‘Previously Developed Status of Land’ has been prepared, ‘specifically to correct the description of the site as pasture land.’ (And additionally as set out at paragraph 1.5 of the report in response to the fact that, ‘The Local Planning Authority now has a requirement to produce and maintain a register of previously developed land within its administrative area.’

12.14 It is highlighted that, ‘There is no evidence of the site ever being in agricultural use in recent times. ‘It is considered that because of the history of previous uses of the site that it is to be regarded as Previously Developed Land, which increases its suitability for residential development. Other than the existing Green Belt designation, there are no other overriding constraints to the site which would prevent its early release for development.’ It is in the hands of a house builder and therefore it can be delivered without delay.

Settlement boundary of Send Marsh
12.15 Land at Polesden Lane and Send Marsh Road, Send Marsh is bordered on three sides by established housing and defensible boundaries including a footpath to the west (footpath number 46) and a second footpath to the north of the site (footpath number 45). It therefore lies within the effective framework of Send Marsh Village although it does not fall within the proposed settlement boundary as defined by the draft Local Plan.

12.16 As demonstrated in these representations Land at Polesden Lane and Send Marsh Road, Send Marsh is a largely unconstrained site in a sustainable location which is available immediately for development.

Incorrect Assumptions in the Sustainability Appraisal

12.17 Although the spreadsheet which accompanies Table C of Appendix IV of the Sustainability Appraisal was not made available for the full six week consultation period an initial assessment of this appraisal highlights significant inaccuracies in the information utilised to assess our client’s site.

12.18 In particular ‘Land north of Send Marsh’ is incorrectly identified as being located within Flood Zone 3 and not being previously developed land. The site is therefore given a red ranking against these categories in the site options appraisal.

12.19 The Council has previously been presented with evidence to demonstrate that the site is not at risk of flooding and significant evidence “to support the case for the site being Previously Developed Land.”

12.20 Based on the classifications set out in Table C and the accompanying spreadsheet it would appear that the Council has failed to take these representations and previously submitted information into account and no assessment of this evidence appears to have taken place.

12.21 Using accurate information to assess our client’s site, ‘Land north of Send Marsh’ ranks joint second out of all of the sites assessed in Send Marsh for housing use with a total of 11 green rankings.

12.22 It is therefore apparent that ‘Land north of Send Marsh’ performs strongly when assessed against the 21 categories that the Council have opted to appraise all reasonable site options against.

12.23 In order to minimise any potential for legal challenge to the Local Plan process, the SA should therefore be updated to take the above points into consideration and demonstrate how all reasonable alternatives have been considered in order to ensure the soundness of the plan.

Conclusion

12.24 The application of the approach in our Green Belt Assessment and evidence presented in our previously developed land report demonstrates that inter alia on the basis the site would provide for around 70 dwellings that our site should therefore be allocated for residential development. This approach would ensure the soundness of the plan and in particular policies S2: Borough Wide Strategy, P2: Green Belt and D4: Development in urban areas and inset villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160718 Guildford Local Plan Representations July 2016 - 2.pdf (15.8 MB)
1. I OBJECT to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to:
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/649  Respondent: 15256769 / Freda Boyle  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?**

( ), is Sound? ( ), is Legally Compliant? ( )

GBC have failed to provide good evidence in terms of Employment Lands Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/652  Respondent: 15256833 / C J Vickers  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?**

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GBC have failed to provide good evidence in terms of Employment Lands Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013.

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1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
° The “objectively assessed need” figure of 693 homes a year is too high.
° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
° The current SHMA inflates the proposed housing figure due to
° failure to correct for errors in the historical data for international migration flows,
° issues with the way it considers students and affordability and
° flaws in the method for estimating the number of homes needed to support job growth.
° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/681  Respondent: 15264001 / Robert Peake  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: PSLPA16/3563  Respondent: 15265377 / Emma Thompson  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/693  Respondent:  15265793 / Sam Rowley  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

10 I OBJECT TO THE LAKE OF ANY EVIDENCE FOR THE ALLEGED HOUSING NEED NUMBERS

11 I OBJECT TO THE LACK OF IMMEDIATE PROVISION FOR NEW SCHOOL AND DOCTORS

12 I OBJECT TO GUILDFORD BOROUGH COUNCIL BEING RUN AS PROFIT MAKING BUSINESS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/696  Respondent:  15266305 / A Andrews  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Council has failed to provide sound evidence in terms of the Employment Lands Assessment 2015 which show an 80per cent reduction in employment space from previous ELNA carried out by the Guildford Borough Council in 2013. This means the industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SMA) are highly questionable. The number of foreign students has been wrongly used to inflate numbers. The required 1386 houses in the local plan is exaggerated if the population is to grow by some 20,000 in the plan we actually need 8000 houses (based on an average of 2.5 persons per household.) The Green Belt does not need to be built over. The Guildford Borough Council's transport Assessment was not available to councillors before the vote was taken on May 24th being published on 6th June. Infrastructure overload has received scant attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/663  Respondent:  15266785 / Trenfold Property Limited and Countryside Properties Limited  Agent:  Boyer (Michelle Thomson)
1.13 Since the previous 2016 Regulation 19 consultation Guildford Borough Council have updated and expanded their evidence base for the Local Plan. A summary of the key alterations and additions are set out below:

- A new document entitled the ‘West Surrey Strategic Housing Market Assessment (SHMA) Guildford Addendum’ has been produced;
- The Employment Land Needs Assessment (ELNA) has been updated;
- A Retail and Leisure Needs Study Addendum has been produced. This supplements the Retail and Leisure Study update of 2014;
- The Travellers Accommodation Assessment (TAA) has been updated;
- A Water Quality Assessment report has been produced;
- The Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) have been updated;
- A new Land Availability Assessment (LAA) Addendum has been produced;
- An Open Space, Sports and Recreation Assessment has been produced;
- An Assessment of Sites for Amenity Value has been prepared;
- An Addendum to the Strategic Highway Assessment Report has been prepared;
- The Guildford Borough Transport Strategy has been updated; and
- A new Land Availability Assessment (LAA) Addendum has been produced;
- The Guildford Borough Transport Strategy has been updated; and
- A Borough, Economy and Infrastructure EAB Report Sustainable Movement Corridor – Update has been produced.

1.14 In addition the series of topic papers produced as part of the evidence base for the emerging Local Plan has also been updated. There are now a total of 11 topic papers associated with the 2017 version of the emerging Local Plan.

1.15 The most significant update to the evidence base has been the preparation and publication of the ‘West Surrey Strategic Housing Market Assessment (SHMA) Guildford Addendum’. The significance is that the findings of this report have had the most far-reaching implications on the 2017 version of the emerging Local Plan.

1.16 Specifically the SHMA Addendum, which is intended to supplement the West Surrey SHMA previously published, reduces the Objectively Assessed Need (OAN) for Guildford from 693 homes per year to 654 homes per year.

1.17 As a consequence of this reduction a number of the other evidence base documents and topic papers have been revised alongside draft policies within the emerging Local Plan, proposed site allocations and the policies maps.

1.18 The SHMA Addendum is stated to have taken into account the latest population and household projections, the latest post-Brexit economic projections and the latest 2015 midyear population estimate.

2.1 This section considers the main implications of the key changes proposed of relevance to the promotion of Land at Polesden Lane and Send Marsh Road. The key changes are considered under the following topics:

- Implications of the SHMA Guildford Addendum Report 2017;
- Implications for the Duty to Co-operate; and
- Implications for Housing Delivery and Five Year Housing Land Supply;

**SHMA Guildford Addendum Report 2017**

2.2 As set out in Section 2 of this report one of the most significant influences on the 2017 version of the emerging Local Plan has been the addition of the ‘West Surrey Strategic Housing Market Assessment (SHMA): Guildford Addendum Report 2017’ to the evidence base.

2.3 The Council notes in paragraph 2.9 of their Topic Paper on Housing Delivery (June 2017) that this document “sits alongside and supplements the West Surrey SHMA. It takes account of the latest population and household projections, the latest post-Brexit economic projections and the latest 2015 mid-year population estimate.”

2.4 As a result of this Addendum Report the Objectively Assessed Need (OAN) for Guildford has been revised from 693 homes per year to 654 homes per year. The Plan period has also been revised from 2013 – 2033 to 2015 – 2034.
2.5 Guildford Borough Council has sought to use this as justification to reduce the total number of homes proposed to be delivered in the Guildford Borough from 13,860 homes in the 2016 version of the emerging Local Plan to 12,426 homes in the 2017 version of the Local Plan.

2.6 However Paragraph 47 of the National Planning Policy Framework (NPPF) requires Local Planning Authorities to “boost significantly the supply of housing”.

2.7 It is apparent from the findings of the Addendum Report in respect of demographic and affordability assessments that the evidence does not support the proposed reduction in the OAN.

2.8 In particular the Addendum Report highlights that “the expected population growth and housing need rise slightly, with a growth of 22,000 persons expected (15.1%)”. Taking account of the longer term migration trends housing need is noted to be between 521 and 584 dwellings per annum (dpa). The Addendum Report utilises the mid-point of 552 dpa. This represents a significant increase from the demographic need of 517 dpa set out in the 2015 West Surrey SHMA. In addition this is only the mid-point assessment and therefore there is no certainty that the full need will be met by using this figure rather than the highest demographic projection of 584 dpa.

2.9 With regards to affordable housing the Addendum Report also illustrates that need has increased from 478 dpa to 517 dpa. In addition “the latest data shows lower quartile house prices…are 11.5 times earnings in the Borough…and points to affordability pressures within the local market”. Paragraph 5.32 also acknowledges that “house price growth has accelerated in the Borough since mid-2013”.

2.10 As acknowledged in paragraph 8.14 of the Addendum Report “the evidence conclusively supports an upward adjustment to improve affordability, taking account of the market signals and affordable housing needs evidence”.

2.11 It is therefore apparent that there is a clear and increasing need for housing within the Borough. The demographic and affordability findings of the Addendum Report therefore do not support the proposed reduction in OAN incorporated into the 2017 version of the emerging Local Plan.

2.12 We do not therefore support the lower OAN figure utilised in the 2017 Proposed Submission version of the Local Plan. As well as being based on an evidence base which has been prepared contrary to national policy the most recent demographic and affordability findings clearly illustrate a requirement for uplift in housing figures not a reduction. This amendment to the Local Plan is therefore considered to be unjustified and unsound.

Woking
2.21 As acknowledged by Guildford Borough Council in paragraph 4.6 of the Housing Delivery Topic Paper Woking have a substantial unmet need estimated by Guildford Council to be in the region of 3,150 homes.

2.22 However, Guildford Borough Council set out in both the Housing Delivery and Duty to Co-Operate Topic Papers that they “do not consider that we can suitably accommodate any unmet need arising from Woking”.

2.23 This is an unjustified statement from the Council particularly given that the previous Regulation 19 Local Plan from 2016 proposed higher housing numbers which the Council considered at the time were acceptable and sustainable.

2.24 Regardless of the failure to provide sound justification for the reduction in housing numbers if the Council now considers that it no longer requires the amount of housing delivery previously proposed then the remainder of this housing supply should be allocated to meeting Woking’s unmet needs.

2.25 A reduction to the OAN should not necessarily equate to a reduction in the amount of housing to be delivered. Even if Guildford Borough Council were able to justify a reduced OAN for Guildford, the fact that their previous version of the Local Plan demonstrated a higher delivery of housing numbers was possible, demonstrates they are able to contribute at
least this number of houses to meeting their duty to co-operate, in this case through meeting Woking’s unmet housing requirements.

2.26 The Council set out in their Housing Delivery Topic Paper the need for flexibility within their own Local Plan to ensure sufficient delivery of housing. Furthermore they also highlight that they have carried out an assessment of the sites removed from the Local Plan since the 2016 public consultation as options for meeting unmet need from Woking (Paragraphs 4.17 to 4.28).

However, this assessment is highly limited and inadequate. It fails to recognise the significance of meeting the unmet housing needs within the HMA and instead assesses sites in an insular manner considering only the benefits or harm to Guildford.

2.28 This assessment also only considers the sites which have been discounted from the 2016 version of the Local Plan and fails to consider the ability of Guildford Borough to meet the unmet needs of Woking on a holistic basis as part of their site selection process.

2.29 Indeed the Inspector of the emerging Waverley Local Plan noted in the recent Examination in Public that it was appropriate for both Waverley and Guildford to accommodate the unmet need from Woking. In particular he recommended that both Waverley and Guildford Council accommodate the equivalent of 150 homes for Woking each year.

2.30 He also expressed his surprise that Guildford had removed a number of draft allocations from the Plan but would still not be meeting any unmet need from Woking.

2.31 Specific reference was made to previously proposed Green Belt releases which Guildford Council consider there are no longer exceptional circumstances to justify. However, the Inspector expressed his view that meeting unmet housing need should be treated as a high priority. Indeed it should certainly be considered as a significant benefit to Green Belt release within the Guildford Borough.

2.32 However, the Council demonstrates no evidence of assessing their draft site allocations against the potential to meet the unmet needs of Woking. Instead the preparation of the Local Plan has concentrated solely on the advantages and disadvantages to the Guildford Borough in isolation.

2.33 The ‘Guildford Borough Proposed Submission Local Plan: Strategy and Sites (2017)’ therefore does not currently satisfactorily demonstrate that it has been prepared in a positive manner. The Council should seek to address this matter before the emerging Local Plan proceeds to Examination.

Housing Delivery and Five Year Housing Land Supply

2.34 Paragraph 47 of the NPPF requires Local Planning Authorities to “identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements”. In addition “where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply”.

2.35 Where a local planning authority is unable to demonstrate a five year supply of deliverable housing sites then “relevant policies for the supply of housing should not be considered upto-date” in accordance with paragraph 49 of the NPPF.

2.36 As acknowledged by the Council in their Housing Delivery Topic Paper the decision to rely substantially on strategic sites to deliver housing during the proposed Plan Period means that their existing backlog, created by historic poor delivery levels, is unlikely to “be capable of being met in the first five years of the plan”.

2.37 The strategy adopted by Guildford Borough Council in the emerging Local Plan therefore fails to address the existing backlog of housing need early in the Plan period but instead delays the delivery of this essential housing until much later in the Plan period.
2.38 Indeed the updated Housing Trajectory published in the Land Availability Assessment (LAA) Addendum 2017 which forms part of the evidence base for the emerging Local Plan demonstrates that housing delivery will not exceed the cumulative target until 2025/2026. Given that the Plan period commences in 2015 this represents a decade of housing delivery before Guildford Borough addresses the backlog.

2.39 This clearly demonstrates that the strategy proposed by Guildford Borough Council in regards to housing delivery results in too much housing being planned towards the end of the Plan period owing to “the reliance on a number of strategic sites which by their very nature take longer to deliver” (Paragraph 4.189, Housing Delivery Topic Paper).

2.40 This is re-iterated in Paragraph 4.11 of the Housing Delivery Topic Paper which highlights the “uncertainties related to the delivery of certain key infrastructure” and that “a number of our strategic sites are dependent on the delivery of Highways England’s A3 Guildford scheme”.

2.41 Concerns about this approach are set out in detail in our previous representations. In particular the reliance on strategic sites which require the delivery of significant infrastructure in order to come forward. This may have a significant impact on the housing delivery trajectory of the Council who would have limited opportunities to address any issues given the late stage in the Plan period. The risk of the Council being unable to demonstrate a five year housing land supply during the course of the Plan is therefore much higher.

2.42 The Council should therefore reconsider their approach to site allocation and incorporate a greater range of sites into their proposed allocations. In particular the Council should allocate a greater number of smaller sites (as advocated in our previous representations) to address the substantial backlog and requirement for additional housing in the Borough.

2.43 Land at Polesden Lane and Send Marsh Road could deliver approximately 70 dwellings of both market and affordable housing within the first five years of the Plan period. This will contribute towards meeting the extensive needs which exist within this area as well as within the Borough as a whole at the beginning of the Plan period.

2.44 We have demonstrated through our previous submissions that the existing Green Belt designation associated with this land should be removed. We have also demonstrated that there are no practical constraints to the immediate delivery of this site. Land at Polesden Lane and Send Marsh Road could therefore make a valuable contribution to addressing the lack of housing delivery at the beginning of the Plan period.

2.45 This approach would also reduce the risk of the policies set out in the emerging Local Plan being found out of date in accordance with policy 49 of the NPPF owing to a lack of five year housing land supply.

2.46 In particular between 2019/20 and 2023/24 at least 3,719 dwellings will need to be delivered based on the trajectory proposed in draft Policy S2 and in order to address the backlog of at least 1,319 dwellings expected to have accumulated from historically low delivery rates. (Based on figures taken from the Housing Trajectory in the LAA Addendum 2017). Applying a 20% buffer to this figure to take into account the persistent under delivery of the Council results in a requirement to deliver at least 4,463 new homes in this initial period of the Plan.

2.47 However the Housing Trajectory in the 2017 LAA Addendum identifies only 3,582 homes which can be delivered during this period. As such there is a shortage of 881 new homes in this initial period in order to address the historic backlog and the emerging housing requirements of the Borough even with a revised OAN of 654.

2.48 On this basis the Council would therefore fail to be able to demonstrate a five year housing land supply at the time the Local Plan was to be adopted.

2.49 Given that the Council currently calculates its own five year housing land supply to be 2.36 years the proposed housing strategy put forward in the emerging Local Plan is clearly not effective or justified in its approach.

2.50 The Local Plan would fail to significantly boost the supply of housing within the Borough and would fail to address the historically poor delivery rates and associated backlog of the Council.

2.51 In order to ensure that the Local Plan is found sound at Examination we would therefore strongly recommend that the Council revises its housing trajectory to incorporate a greater number of smaller sites which can deliver in the earlier stages of the Plan period thereby ensuring that the Housing Trajectory is robust and achievable.
2.52 This would accord with paragraph 035 of the NPPG which states that “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period”.

2.53 As set out in these representations Land at Polesden Land and Send Marsh Road is an unconstrained site in a sustainable location which is available immediately for development.

**Housing Delivery & Five Year Housing Land Supply**

4.11 As set out in Section 3 of this report the over reliance of the Local Plan on strategic sites expected to deliver housing at the very late stages of the Plan period significantly increases the risk of the Council to be unable to demonstrate a five year housing land supply.

4.12 Indeed based on the information set out in the most recent LAA it would appear that the Council will be unable to demonstrate a five year housing land supply at the point at which the Local Plan is intended to be adopted.

4.13 This is largely as a result of the Council’s inability to address their historic backlog of housing resulting from many years of persistent under delivery in the early plan period.

4.14 The Council have sought to mask this issue by setting significantly lower annual housing target figures in the early Plan period (450 new homes vs an OAN of 654) which subsequently increase significantly to 850 new homes in 2033/34.

4.15 However, it is clearly apparent that the proposed housing delivery strategy set out in the emerging Guildford Local Plan fails to significantly boost the supply of housing or address the historic backlog of the Council early in the Plan period.

4.16 The housing delivery strategy for the Borough should therefore be revised to incorporate a greater number of smaller sites which can be delivered much earlier in the Plan period and provide greater security in respect of the delivery of housing.

4.17 Land at Polesden Lane and Send Marsh Road is an example of a smaller scale site which could deliver these requirements and significantly contribute towards addressing the failings of the current housing delivery strategy.

**Flood Risk**

4.23 Despite our previous representations and updates made to the Sustainability Appraisal in June 2017 Land at Polesden Lane and Send Marsh Road is still incorrectly given a red ranking against flood risk.

4.24 The Council have been provided with evidence to demonstrate that the site is not at risk of flooding and this ranking is therefore incorrect.

4.25 In order to minimise any potential for legal challenge to the Local Plan process, we once again re-iterate that the sustainability appraisal should be revised to take into account the matters raised above and demonstrate how all of the reasonable alternatives have been considered. This is necessary to ensure the soundness of the Plan.

**Summary**

4.26 In accordance with paragraph 182 of the NPPF in order for a Local Plan to be found sound at examination the Local Planning Authority must demonstrate that it is:
- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

4.27 As demonstrated in these representations the evidence base upon which the 2017 version of the Local Plan is based is not consistent with national policy. In particular the SHMA Addendum Report entirely ignores the HMA within which Guildford lies.
4.28 The proposed revisions to the OAN set out in the 2017 Regulation 19 version of the Local Plan and the amendments proposed to the Green Belt boundaries as a result are not therefore considered to be justified.

4.29 As a result of relying upon this flawed evidence base and the decision to reduce the proposed OAN in the latest version of the Local Plan it cannot be considered to be effective. Indeed it fails to address the increasing need for housing in the Borough and meet the NPPF requirement to “significantly boost the supply of housing”. It also fails to address the existing backlog of housing development early in the Plan period and does not demonstrate a five year housing land supply at the date the Plan would be adopted.

4.30 Finally the Plan cannot be said to be positively prepared given that the SHMA Addendum Report has been prepared in isolation and fails to address the unmet requirements of the neighbouring authority of Woking.

4.31 These matters should be addressed by the Council before the emerging Local Plan proceeds to Examination.

4.32 As demonstrated above Land at Polesden Lane and Send Marsh Road could significantly assist the Council in addressing the shortcomings of the proposed submission version of the Local Plan. The site can deliver additional housing in the early years of the Plan period in a highly sustainable location.

4.33 Contrary to the conclusions of the Council this can be achieved on a previously developed site without any significant adverse impact to the Green Belt and on land that lies within Flood Zone 1. It would also deliver a new justifiable and defensible boundary to the Green Belt.

4.34 Trenfold Property Limited and Countryside Properties (UK) Limited are keen to work in a positive and collaborative manner with Guildford Borough Council to identify the most appropriate facilities for this location and contribute towards the delivery of new housing in the Borough on an unconstrained site which is capable of providing new housing immediately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 170724 Representations.pdf (6.9 MB)
Our client objects to the removal of former site allocation 68 from the proposed submission local plan for the reasons set out below.

**Need for Housing**

Guildford Borough is currently not meeting its’ housing requirements. The 2014-15 Annual Monitoring Report sets out on page 9 that Guildford had a 1.4-year supply of housing. It further states on page 11:

“We are not currently able to demonstrate a five year supply of deliverable housing land without amendments to Green Belt boundaries and use of countryside land (against objectively assessed housing need of 693 homes a year).”

This is again acknowledged in paragraph 4 of the decision letter for appeal reference APP/Y3615/W/15/3132375, which states:

“The Council indicate that it cannot demonstrate a five year supply of housing land.”

West Surrey Strategic Housing Market Assessment (2015) identifies that there is a need for a mix of house sizes across the housing market area as identified in Table 8.

In respect of the strategy put forward in the proposed submission local plan to deliver housing, the Council are placing undue reliance on Policy A35: “Land at former Wisley airfield, Ockham.” This site is proposed for allocation for the delivery of 2,000 homes. This one site is proposed to contribute up to 14% of the housing required over the plan period.

Our client considers that significant uncertainties exist in respect of the delivery of the Wisley airfield site and that this strategy is therefore unsound.

In addition, a planning application for the site proposed in Policy A7: “Land and buildings at Guildford railway station, Guildford” (planning application reference: 14/P/02168) was refused on 30th June 2016. This potential allocation includes redevelopment for approximately 350 homes. Our client considers that uncertainty exists over the delivery of this and other potential previously-developed sites thereby meaning the proposed number of homes to be delivered in the plan as set out in Policy S2 is unlikely to be met.

Further consideration should therefore be given to the delivery of smaller, sustainable sites, such as “Land at Hornhatch Farm.”

**Lack of Justification for Removal of Site**

“Land at Hornhatch Farm” was included as a potential development site in the “Draft Guildford Borough Local Plan: Strategy and Sites” (July 2014). The reasons given for its omission from the proposed submission local plan are:

“Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt.”

Our client considers that the justification for the site’s exclusion is based on subjective qualitative methodology used to assess the Green Belt, which has only been published for consultation at a late stage in the plan-making process. The forthcoming plan has therefore not been prepared in the light of a robust evidence base.

**Sustainability**

Allocation of “Land at Hornhatch Farm” would form a sustainable extension to Chilworth. The site was previously assessed in the 2014 “Draft Guildford Borough Local Plan: Strategy and Sites” as suitable for residential development within one to five years. The site is located in Environment Agency Flood Zone 1 (low risk of fluvial flooding) and is within 5 to 7km of the Thames Basin Heaths Special Protection Area (SPA) and therefore is beyond the zone of influence of this SPA.
**Green Belt Considerations**

Paragraph 89 of the National Planning Policy Framework (NPPF) states that local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It also sets out that authorities should consider Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Our client considers that there is a clear case for removal of the site from the Green Belt and its retention as a site allocation for residential development. The site would have clearly defined boundaries as required by paragraph 85 of the NPPF. Our client notes that additions to the Green Belt are proposed to be made elsewhere in Guildford Borough. This approach is supported.

**Deliverability**

The site is within single ownership, is available now and development would be achievable in the short to medium term.

**Conclusions**

Land known as “Land at Hornhatch Farm” should be retained as an allocation for residential development in the Guildford Borough Submission Local Plan: Strategy and Sites.

Guildford Borough is not currently meeting housing delivery requirements and the strategy put forward in Policy S2 is unsound due to an overreliance on particular site allocations, such as Policy A35: “Land at former Wisley airfield, Ockham.”

A lack of justification has been provided for the removal of “Land at Hornhatch Farm” from the spatial strategy and there has been a lack of proper consultation on the “Green Belt Sensitivity Map.”

Allocation of the site for residential use would have the benefit of bringing forward a deliverable sustainable extension to Chilworth that would contribute to providing much-need housing in Guildford Borough.

I trust that this letter is clear but please do not hesitate to contact me if you have any questions or queries.

**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 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Housing Numbers

The housing numbers proposed are too high. It does not take any account of the constraints that apply locally. It is based on a Strategic Housing Market Assessment (SHMA) which the full council required to be amended by the then Lead Councilor for Planning and the Head of Planning. No amendment has taken place; those individuals are no longer in their posts. A new, revised, SHMA on a joint basis with Woking and Waverley has not yet been published and is not part of the evidence base. How can anyone comment on the proposed plan when the fundamental housing number is still so uncertain?

1. Brownfield Sites are Available

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• No joint SHMA with neighbouring boroughs has been produced, as required
• There is no Strategic Environmental Assessment included, as required
• No sustainability assessment is presented for any of the sites
• No infrastructure document is present
• The evidence base is shot through with many factual and calculation errors
• A number of assumptions used in the evidence base are unsupported by evidence
• The results of calculations are included, without the underlying workings provided
• Settlement boundaries have been arbitrarily extended, without any meaningful explanation

Our road leads to the area around the site off Green Lane in West Horsley which is at risk of development per your plan and this area is a major flood risk, with raw sewage pouring into the roads, on the occasion of the last major flood at Christmas 2013. We are very concerned and object to this area being developed.

In conclusion, I ask GBC to revise the housing number, and to amend the Local Plan to utilise brownfield/previously used land rather than green field sites – of which there are significant amounts of the former within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/3854  **Respondent:** 15274241 / Chris Finden-Browne  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the plan on the grounds that is based on unsound and questionable evidence in several areas:
  ◦ The Strategic Housing Market Assessment 2015 (SHMA) uses an estimate of number of houses needed to population growth which overstates the number of houses needed. Further, a larger proportion of any house building can be set on brownfield sites.

Guildford Borough Council's own Transport Assessment was not even available when the councillors voted on the Plan on 24 May - it was published on 6 June.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/4138  **Respondent:** 15277185 / David Skinner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In addition, I do not agree with the 'objectively assessed need' of 693 new homes a year. For example, this does not consider student housing separately. In addition demographic and economic models supporting the figure should be freely available. Otherwise the process is not accountable. I also think the medium term economic growth assumptions should be reviewed post the Brexit vote as these are likely to be lower at least over the next 5-10 years. In addition it would be reasonable to expect inflows due to international migration to be lower. I do not believe there there is sufficient evidence to support the need for expansion that underlies the whole plan.
13. The specific policies about which RPC are concerned are addressed in turn below.

Housing Need Calculation

14. RPC object to the approach taken to the assessment and calculation of the housing requirement in the plan.

15. The PSLP seeks to meet OAN by delivering 693 pa during the plan period, an overall figure of 13,860 in the plan period with delivery of housing numbers increasing from 500 per annum in 2018-19 to 790 p.a. in 2032/33.

16. The justification for this is explained in the Sustainability Appraisal June 2016 at para 6.2.10:

“Guildford Borough Council is committed to delivering its OAN figure, having established that there is no potential to justifiably ‘under-deliver’ and rely on neighbouring authorities to meet the shortfall (under the Duty to Cooperate). Whilst Guildford Borough is heavily constrained environmentally, it does not stand-out as relatively constrained in the sub-regional context. This conclusion is reached on the basis of Duty to Cooperate discussions, past SA work (notably spatial strategy alternatives appraisal in 2013/14 – see discussion above), an understanding of precedents being set elsewhere, and other sources of evidence. It is evidently the case that under-supplying in Guildford would lead to a range of socio-economic problems, given that Woking is already under-supplying within the HMA.21 There is an argument for under-supplying to be preferable from an environmental perspective; however, this argument is far from clear cut given an assumption that unmet needs would have to be met elsewhere within the HMA (i.e. within Waverley, which is heavily constrained) or elsewhere within the heavily constrained sub-region. For these outline reasons options that would involve planning for a level of growth significantly below that necessary to meet OAN are considered unreasonable at the current time.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4558  Respondent: 15278465 / Chris Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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: PSLPA16/4502</th>
<th>Respondent: 15283105 / Chris Woods</th>
<th>Agent:</th>
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<td>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.</td>
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<th>Comment ID: PSLPA16/760</th>
<th>Respondent: 15284801 / Linda Jarvis</th>
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<th>Comment ID: PSLPA16/762</th>
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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are 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:
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/777  Respondent: 15292129 / Shirley Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers. I think there should more research into what housing and where the housing should be built. The infrastructure and amenities can thought about before any planning to put forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/787  Respondent: 15294113 / M J Hickman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 proof that all the numbers of houses, sites etc quoted are in fact correct.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/797  Respondent: 15295329 / Matt Sage  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We would also ask for further evidence to prove the need for such a high numbers of new homes with predictions doubled in the proposed plan from previous.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/802</th>
<th>Respondent: 15295809 / David Lees</th>
<th>Agent:</th>
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I object to the Strategic Housing Market Assessment figure of 693 houses pa being too high.

The Council will not publish the SHMA report, so the figure cannot be verified. This lack of transparency is not right for consultation on the Plan. The number is not credible as it is more than double the figure of 322 used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/803</th>
<th>Respondent: 15296545 / Catherine Lees</th>
<th>Agent:</th>
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I object to the SHMA figure of 693 houses per annum in the borough being too high.

GBC's figures for housing numbers are more than double the historical level. The council's refusal to publish any evidence for this is outrageous and defies local democracy and all notions of transparency. Such practices have no place in a planning consultation. And as such should be rejected until subject to public scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/815</th>
<th>Respondent: 15298017 / Margaret Cousins</th>
<th>Agent:</th>
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1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
   - The “objectively assessed need” figure of 693 homes a year is too high.
   - A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
The current SHMA inflates the proposed housing figure due to:
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/832   Respondent: 15299361 / Jane Finlay   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is doubtful that the proposal of 13,000 plus houses to be developed are reasonable and sustainable, particularly in view of Brexit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/835   Respondent: 15299425 / Tim and June Yorath   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. We believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First we believe constraints should have been applied. Secondly we believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>ID</th>
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<tbody>
<tr>
<td>PSLPA16/849</td>
<td>15300961 / Mercia Underwood</td>
<td>Agent</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>I am greatly concerned about the strategic housing market assessment plans for the future of housing in east and west Horsley and also for their removal from the Green Belt which seems to me a political move and not one of consideration. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
</tr>
<tr>
<td>PSLPA16/863</td>
<td>15301601 / Tina Grear</td>
<td>Agent</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>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. It also fails to take into account the new situation due to Brexit, a factor which makes the draft Local Plan now appear hopelessly out of date. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
</tr>
<tr>
<td>PSLPA16/867</td>
<td>15302081 / C.A. Sayers</td>
<td>Agent</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
</tr>
<tr>
<td>PSLPA16/875</td>
<td>15303649 / Maureen Wilkins</td>
<td>Agent</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>2. Number of houses required I disagree with the number of houses required in this plan.</td>
</tr>
</tbody>
</table>
Much uncertainty seems to surround the figure of 693 houses required (SI-IMA figure). This is double the figure quoted only 4 years ago. This figure proposes a disproportionate amount of development to the north of Guildford, which will result in serious affects for Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/881  
Respondent: 15304065 / Andrea Mills  
Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/884  
Respondent: 15304481 / E Roker  
Agent: 

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 any evidence for the alleged housing need numbers. Its so sad when you feel to destroy the beautiful Green Belt when there is plenty of brown belt all round that could be used.

We all have problems already trying to get doctors and hospital appointments because every village has too many houses and people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/888  
Respondent: 15304897 / Richard Baker  
Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **I OBJECT** to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially
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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/906  **Respondent:** 15304929 / Rosemary Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

0 The 'objectively assessed need' figure of 693 homes a year is too high.

0 A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to

  - failure to correct for errors in the historical data for international migration flows,

  - issues with the way it considers students and affordability and

  - flaws in the method for estimating the number of homes needed to support job growth.

0 It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan, this is yet another example of the lack of transparency and the same can be said of the way that the Garlick’s Arch site was sprung on the locals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on 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: PSLPA16/920  
**Respondent:** 15314817 / Mr and Mrs Daniels  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) **WE OBJECT TO** the lack of any evidence for the alleged housing needs. Because the Council will not publish the SHMA report, these figures cannot be verified. This lack of transparency is not right for consultation on 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: PSLPA16/924  
**Respondent:** 15314881 / Gill Haig-Brown  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) I have been unable to find out what evidence GBC has given for this level of housing need.

I object to this evidence not being made available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/927  
**Respondent:** 15315009 / Edward Dennis  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.
But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/938  
Respondent: 15320801 / J.A Sayers  
Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1045  
Respondent: 15321217 / Sally Rule  
Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

How did you get to this number and is there a report to validate this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/961  
Respondent: 15322017 / Colin Keywood  
Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/954  
Respondent: 15323841 / Claire Parker  
Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/963  Respondent: 15324705 / Isobelle Keywood  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/966  Respondent: 15324833 / Ann Gifford  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence being produced for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/978  Respondent: 15326273 / John Haslam  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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**EVIDENCE.**

GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home).

The Green Belt does not need to be built over. 50% of new homes needed could be built on brownfield sites. GBC's Transport Assessment was not even available to councillors for the vote taken on 24 May, being published on 6 June. Infrastructure overload has received scant attention.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/981</th>
<th>Respondent: 15326401 / Claire Haslam</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><strong>Respondent:</strong> 15327873 / Susan Richards</th>
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Attached documents:

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1. I OBJECT to SHMA figure of 693 homes per annum. The methodology determining the GBC SHMA figure seems to be cloaked in secrecy in spite of many requests from residents in the borough to examine the evidence base. We certainly know that the figure of 693 pa is artificially inflated due to the inclusion of many numbers of Surrey University and Law College students, many of whom are foreign students with absolutely no intention of remaining in the UK let alone within our borough. The inaccuracy of the SHMA assessment is a major concern as there is no transparency allowing for any investigation of modelling used. This is not democratic and indeed is one of the most heatedly discussed aspects of this Local Plan. More importantly, GBC have an absolute ability to massively reduce any SHMA figure by implementing the NPPF guidelines regarding protection of our Greenbelt, AONB and Thames Basin Heath SPA. GBC have conspicuously refused to address this issue,
whereas many other Borough Councils have utilised these planning constraints to significantly reduce their own SHMA. Why is GBC failing to protect our Greenbelt, wildlife and beautiful landscape? In addition to this, surely we must reconsider all housing needs assessment given the recent BREXIT referendum, the current instability of the UK politically and the absolute certainty that mass net migration from Europe into the South East of England will no longer be such a huge issue, with the resulting decrease in demand for additional housing in the South East.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1800  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1020  Respondent: 15329505 / Martine Early  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1023  Respondent: 15329569 / P.J Kirkwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1025  Respondent: 15329825 / Sylvia Lodger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/1027  Respondent: 15330017 / Honor Grear  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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. It also fails to take into account the new situation due to Brexit, a factor which makes the local draft now appear hopelessly out of date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1034  Respondent: 15331489 / Harry Axten  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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?

Surely with Brexit it is possible that all this housing will no longer be necessary and this plan will just make a lot of money for an already wealthy few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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The "objectively assessed need" figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and Flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Comment ID: PSLPA16/3344  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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I understand that the Strategic Housing Market assessment done for this area is quite out of sync with the official estimate of population growth in the Borough, so one must ask, who gains from this proposal other than vested interests in the building trade and insiders to the process. In all we find these proposals to be wholly unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I am writing to expression my objections to many aspects of this Plan:

1. Housing Growth - I question the basis of the housing targets which do not represent reality and I understand are based on a model provided by a Third Party but details of which are not available to GBC nor the general. This is a highly questionable way of projecting future housing growth. Indeed the Plan envisages a growth of 25% over the plan period whereas the Office of National statistics forecasts a 15% growth.

I object therefore to the scale of the Housing targets proposed in the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I OBJECT TO lack of evidence to the need for more housing in the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
7. We object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

We demand that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1142  Respondent: 15366529 / Roger Singleton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need or numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1145  Respondent: 15367361 / Greg Ganjou  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1147  Respondent: 15367361 / Greg Ganjou  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1149  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1152  Respondent: 15368129 / Sharon Cork  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. APPENDIX D

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1169  Respondent: 15368993 / Tessa Spink  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to
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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: PSLPA16/1171  Respondent:  15368993 / Tessa Spink  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. APPENDIX D

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1184  Respondent: 15370497 / Edward Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

16. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1185  Respondent: 15370593 / A Gee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

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Attached documents:

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Housing Numbers** - There is no detailed evidence for the proposed number of housing. Numbers quoted are now double what they were despite potential reduction in estimated population due to reduced net migration following our EU exit. I therefore believe these calculations to be based on flawed data.

I object to how the Strategic Housing Market Assessment has been worked out. There is insufficient detail and it is 50% higher than average and therefore likely to be flawed.

The historic village of Burpham will completely lose its identity, and become part of a long corridor of urban sprawl along the A3 North bound towards London.

Truly affordable housing will never be built in this area. Any reference to such is flawed.

Please consider my strong objection to the proposals in the plan as stated above.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1194  **Respondent:** 15371361 / Friends of Normandy Wildlife (Alistair Lawson)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**


Evidence is expected to be up-to-date and relevant. However, the evidence that GBC presents is neither accurate nor up to date. In the Settlement Profiles document (2013) which is part of the Settlements Hierarchy referred to in the Evidence Base (Appendix D of the Plan) GBC state (page 49) "There is a Site of Nature Conservation Importance (SNCI) to the north of Normandy" whereas in fact there are 4/5 SNCIs to the north of Normandy (see Map 2, Appendix 1) namely: Withybed Copse and Henley Park Fields SNCI, Normandy Common SNCI, Wyke School Wood SNCI, and Wyke Churchyard SNCI, and arguably part of Wanborough and Normandy Woods SNCI. In addition to these, there are two others in Normandy Parish, namely Little Flexford SNCI, and Broadstreet Common and Backside Common SNCI, as well as the remainder of Wanborough and Normandy Woods SNCI. An eighth SNCI, Greencut Copse SNCI is outside Normandy Parish but within 2 km of Site A47.

We are of the opinion that the evidence is flawed and, had it been assessed correctly, A46 would not have been included in 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:** PSLPA16/1195  **Respondent:** 15371777 / Peter Thackery  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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 numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough's permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For the West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1198   Respondent: 15372417 / P. Mew   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1208   Respondent: 15373313 / Hugo Holden   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1210  Respondent: 15377473 / Deborah Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPA16/2419  Respondent: 15377473 / Deborah Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1222  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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<thead>
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<th>Comment ID: PSLPA16/1224</th>
<th>Respondent: 15379969 / Teresa Britton</th>
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Attached documents:
Comment ID: PSLPA16/1229  Respondent: 15380129 / Penny Moore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. The inflated numbers of houses which have been arrived at through the “Strategic Housing Market Assessment”, the methodology for which is not revealed;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4333  Respondent: 15380289 / Stephen Hewlett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to the Borough Wide Strategy (Policy S2) GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1238  Respondent: 15381089 / Tim Poyntz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

20. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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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: PSLPA16/1243  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1248  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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   ° The “objectively assessed need” figure of 693 homes a year is too high.

   ° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1259  Respondent: 15384065 / Kevin O'Rourke  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GBC have failed to provide sound evidence regarding the employment land needs assessment 2015 (ELNA) it is my opinion that the land requirements have been over stated on the basis of questionable information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1289  Respondent: 15386017 / Gareth Sinnett  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: PSLPA16/1291  Respondent: 15386017 / Gareth Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

23. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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Section page number: 634 of 933
Document page number: 927
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**APPENDIX D**

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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: PSLPA16/1308  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

9. I object to the lack of transparency in establishing the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which states that 693 homes per annum are required by the borough, which is more than double the figure of 322 used in previous plans.

However as the Council will not publish the SHMA report, this figure cannot be verified. I object to this lack of transparency and factual confirmation of this key issue for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPA16/1823  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Comment ID: PSLPA16/1312  Respondent: 15389025 / Keith Cogan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill, I cannot see any justification or special circumstances for eroding the Green Belt in these locations. I don’t understand and object to the aggregated “housing need” figures quoted which appear far too high. In my view these figures are incorrect and should be challenged before considering developments on our green belt that are not wanted and potentially completely unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1318  Respondent: 15389089 / R.A. Norfolk  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1321  Respondent: 15389121 / M.C. Hollister  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/1324  Respondent: 15389185 / M. Patrick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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1. **APPENDIX D**

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- The “objectively assessed need” figure of 693 homes a year is too high.
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Attached documents:

Comment ID: PSLPA16/1348  Respondent: 15390401 / William Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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**Comment ID:** PSLPA16/1351  **Respondent:** 15390401 / William Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPA16/1358  Respondent: 15391041 / Anne Lawrence  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Transport evidence is not yet fit for use and major transport issues are unresolved e.g. another river crossing, a central bus facility.

The Plan is not ready for an inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1363  Respondent: 15391329 / Marian Tarrant  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object because GBC have exaggerated the need for the 13,860 house currently in the local plan. A population increase of 20,000 in the plan period would require just 8,000 homes based on 2.5 soles per habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1365  Respondent: 15391681 / Martin Pope  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

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Comment ID: PSLPA16/1373  Respondent: 15398081 / Jill Pope  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/1378  Respondent: 15398497 / G J Masson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is in my view considerable doubt about the validity and accuracy of the projected housing need as identified in the Strategic Housing Market.sessment (SHMA) which is giving rise to a proliferation of proposed development schemes along the A3 corridor, much of it on Green Belt land. The Guildford Resident ·s Association (GRA) has arrived at much lower figures and the validity of GB,&'s projected forecasts should be rigorously tested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1379  Respondent: 15398657 / Kim Roberts  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/1382  Respondent: 15398657 / Kim Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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23. APPENDIX D

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** PSLPA16/2325  **Respondent:** 15398817 / Kitewood Estates (Sara Sweeney)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objectively Assessed Need

The need to identify a deliverable supply of new housing land is set out within the Government's National Planning Policy Framework (NPPF), and National Planning Practice Guidance (PPG).

The National Planning Policy Framework (NPPF) places great emphasis on the need to boost significantly the supply of housing (Para 47). Local planning authorities should use the evidence base to ensure that the Local Plan meets the full Objectively Assessed Need (OAN) and furthermore, there is a legal requirement for local planning authorities to consider all reasonable alternatives on how to deliver this need.

Specifically in relation to plan-making, local planning authorities should ensure that the Local Plan base is up-to-date (Para 158, NPPF), as this will be the starting point in the process. PPG elaborates on this and requires that the starting point for determining the OAN should be derived from the most up to date population figures.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPA16/1387  **Respondent:** 15399041 / Sue Ely  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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I object to the lack of any evidence for the alleged housing numbers.

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Lack of substance in GBC's so called figures regarding housing needs, which exceed double previous figures of around 320 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPA16/1413  Respondent: 15405857 / Raymond Mackay  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
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The inflated numbers of houses which have been arrived at through the “Strategic Housing Market Assessment”, the methodology for which is not revealed

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</table>

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.
2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1425   Respondent: 15406529 / David I Allan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the procedural short-comings in the development, consultation and delivery of this Plan, which has been based on highly questionable 'evidence' that should now be revisited in light of the recent EU Referendum. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

Summary

Also, and importantly, I have not seen any justification for the increase in numbers of houses required and presumably that justification will now be less with the decision to leave the EU.

I object to the local plan for the above reasons.
16. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA repository methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, I also understand that it is based on 'commercially confidential' modelling assumptions that cannot be checked, reviewed or audited independently. I note that there has been no transparency to this evidence base and it is therefore impossible to assess its accuracy. I firmly believe that this has been conducted in an undemocratic fashion and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that all my objections made above are fully taken into consideration and that the Plan is withdrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I feel GBC's Housing Assessment report is flawed and the specialist company who carried out the report for GBC were certainly not impartial. There is no concrete evidence to demonstrate that we need in excess of 13,000 houses to be built in the Borough, particularly after Brexit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The plan is not sustainable and there is no 'non biased' specialist report advising of the need for 13,000 plus houses in the Borough, particularly now the country has decided to Brexit. I understand your Advisors work for the Property Developers in the Guildford Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **Planned level of housing need.** I cannot see that the assumption of housing need at 693 per annum has been adequately explained / evidenced - since this is a critical assumption determining the scale of required developments I cant see how any decision to proceed with the plan can be supported.

1. **Traffic and Road infrastructure plans.** Having reviewed the transport impact analysis arising from both the Slyfield link road and the Gosden Hill housing development I have found it unconvincing.
   - As a result of these developments Burpham will be faced with significant traffic increases of both commercial and private vehicles which I would expect to cause major issues on a daily basis
   - In particular the estimate of heavy lorry traffic southbound off the A3 to Slyfield is especially concerning as it is simply too low
   - I have not found any convincing analysis showing the combined effect of the two developments on the traffic in the Burpham area
   - Of particular concern is the lack of consideration of the traffic flows having to pass through Burpham from the Gosden Hill development wanting to travel north along the A3

Until full details of the proposed road infrastructure and a full traffic analysis, detailing assumptions and their appropriateness behind the analysis, is made available I cannot see how a decision to proceed with the plan can be supported.

1. **Air pollution.** I cannot see any adequate estimate of the affect of increased traffic levels on air pollution in the area. I have not been able to find any analysis of either existing levels of air pollution in and around the area and any expected impact from the developments. When looking at the stalled traffic on a daily basis currently seen morning and evening on London Road I would expect high levels of pollution already which will be exacerbated by increases in commercial and private vehicle traffic as a result of the development. Lack of such a detailed baseline analysis looking at the specific areas and critical sites (e.g. Burpham primary school) and the anticipated impact of the development the adoption of the plan may well become subject to legal challenge leading to significant cost and delay to the councils plans.

Until a detailed baseline analysis and impact assessment focused on the specific areas where traffic is expected to increase I cannot, again, see how a decision to proceed with the plan can be supported.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID: PSLPA16/1491  Respondent: 15420833 / Marjorie Moss  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4063  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to

failure to correct for errors in the historical data for international migration flows,

issues with the way it considers students and affordability and

flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to:
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.

- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects

- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability, and
  - flaws in the method for estimating the number of homes needed to support job growth.

- It is unacceptable that demographic and economic model assumptions have been withheld from scrutiny and therefore cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is more than double the figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) I object to the Strategic Housing Market SHMA figure of 693 houses per annum as GBC refuses to publish the report and verify the figures. APPENDIX D: EVIDENCE BASE

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. The housing needs assessment is flawed in various respects and overstates housing. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result the scale of incursions into the Green Belt is based on false premises and should be reconsidered.

1. The Council was entitled to apply constraints before determining the housing number. I believe that as well as being entitled to do this the Council should have done it. It is hard to see why in fact this has not been done. The scarcity of sites outside the Green Belt as well as infrastructure (most notably roads) considerations all represent constraints which should have been taken into account in determining the final housing number.

1. Having properly applied constraints if there is a need to develop in the Green Belt then “exceptional circumstances” must be demonstrated for each site. It can hardly be considered “exceptional” if in fact 65% of the housing ends up on land taken from the Green Belt. The Green Belt should trump short-term considerations such as perceived housing need, as ministerial statements and case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and Green Belt can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report. I believe the SHMA report to be inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of 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: PSLPA16/1527  Respondent: 15426369 / Harvey West  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1530  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The housing needs assessment is flawed in various respects and overstates housing. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

1. Having determined housing need the Council was entitled to consider constraints before determining the housing. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

2. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the Plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1533  Respondent: 15427617 / Ken Scotland  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

23. APPENDIX D

I OBJECT to the SHMA figure of 693 houses per annum in the Borough being too high (Appendix D).

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS (a housing demographics consultant) has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the Borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the Borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1531  Respondent: 15427745 / Barry Nelson  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The SHMA appears to be flawed and the suggested housing need it too high and not provide for the impact of Brexit which could have a significant impact on housing need. I know an independent report commissioned by the Guildford Residents Association contradicts the GBC report in many respects and provides for a significantly lower need figure (without allowing for Brexit). The proposed borough population increase of some 25% would put unsustainable pressure upon an area that is already congested in many respects.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4549  Respondent: 15427745 / Barry Nelson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan does not address the issues around access to the A3, the possible construction of the relief Tunnel that could well be designated to commence within the area covered by the Plan. A corollary of this is the Plan does not address the very significant impact the proposals would have upon (a) traffic movement within the Burpham and Merrow areas and (b) the consequential effect in terms of environmental pollution - vehicle emissions and noise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1535  Respondent: 15427969 / Chris Mealing  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1539  Respondent: 15428097 / Bridget McClellan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft Local Plan for the following reasons.

PLANNED HOUSING NUMBERS
I OBJECT to the number of planned houses rising from 652 to 693 over the next twenty years. The way this has been assessed and calculated is not at all transparent and is more than double figures used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposals contained in the Local Draft Plan.

The number of houses proposed is excessive. An unbiased independently assessed figure is the only acceptable way to determine a true calculation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
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- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/1548  Respondent: 15429697 / Robert Cairns  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 the assessment used in the West Surrey Strategic Housing Market Assessment. for 517 house a year to be built in Guildford over a 20 year period from 2013 to 2033. The infrastructure in the town is already operating at capacity with congested roads, oversubscribed NHS services and capacity commuter services. I do not see how this need can be justified in the context of a public consultation. I would urge the council to reconsider this in the face of strong local opposition and extend the period of consultation to be both more inclusive and allow for due consideration of all interested and not just the narrow and vested political and commercial interests.

I took great pride in the council rejecting the proposed development at Guildford station and hope a similar level of pragmatism can be adopted in this interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1551  Respondent: 15429985 / Jennifer Slade  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 Evidence supporting GBC Strategic Housing Market Assessment 2015 which is highly questionable and for which GBC has consistently refused to provide details of its calculations despite a petition and several requests to do so. I believe that the requirement for 13,860 new homes in the Borough is exaggerated. Even were the population to grow by 20,000, based on an average family size of 2.5 persons in each home, the need would only be for 8000 homes. It would appear that the number of temporary foreign students has been wrongly used to inflate the population need. The Green Belt does not need to be built over to meet that need, when 50% of the 13,860 new homes stated as needed, could be built on existing Brownfield Sites. GBC’s Transport Assessment was not even been made available to Councillors when the vote on the New Local Plan was put to them on 25th May, which again questions the objectivity and competence of GBC and its Planners.

I OBJECT to the Lack of Evidence supporting the need for Industrial Development at Burnt Common. The latest Employment Land Needs Assessment (ELNA) in 2015 shows an 80% reduction in employment space need from the ELNA carried out by GBC in 2013. Bearing in mind the significant amount of vacant premises in the Borough and surrounding area, there is no need for new commercial and industrial development and the traffic and pollution problems that will ensue because of it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1553  Respondent: 15430113 / N Cook  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
What is very worrying is that the Housing assessment report was carried out by GL Hearn who are advisors to house builders, so this report can hardly be deemed credible and GL Hearn certainly have a conflict of interest. To date there is no credible evidence to demonstrate the need for 13,000 plus houses in the Borough and now the country has decided to Brexit, housing needs will change.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/1555</th>
<th>Respondent: 15430305 / Moira Griffin</th>
<th>Agent:</th>
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<td>I object to the lack of clarity / support for the housing numbers included in the Plan</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>Comment ID: PSLPA16/1561</th>
<th>Respondent: 15430369 / Sarah Long</th>
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<th>Respondent: 15430433 / Simon Greenhill</th>
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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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Finally I note the Traveller accommodation assessment was undertaken in June-July 2012 by Mill Field Services, however this company was dissolved in January 2011. More evidence that this proposal is not researched and developed in professional manner.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLPA16/1576  Respondent: 15433473 / Kay Webb  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base**

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 any evidence for the alleged housing need numbers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID: PSLPA16/1579  Respondent: 15433633 / Mike Allcock  Agent:**

**Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am a long standing resident of Guildford currently living in Pirbright and am writing with regards to the draft Local Plan which I have reviewed. Sadly, it is clear that green field sites need to be considered for development but I do sense that certain green field options have not been considered.

Guildford is a wonderful Borough and enjoys the benefits of wonderful green spaces and leisure facilities. The one facility which I feel we do have too much off however is local golf courses. Having been a golfer I have been able to appreciate the beauty of some of our longer established courses locally. However, during the 1990s there was clearly too much development of golf courses and local farmland was given up for these. With the fall in popularity of golf and the increased competition amongst local golf courses I would assume some of those more recently developed courses are no longer financially viable and at risk of failing and the land falling into disrepair.

One such course in the Borough and which I believe would perhaps be a better site for local development is Clandon Park golf club. I am not party to the specific plan for Clandon Park, other than as reported in the Surrey Advertiser in May, and I confirm that I have no financial or other connection to Clandon Park. I have played golf at the course once a few years back and would be concerned that as a golf course it is not the most viable in the Borough.
In the Surrey Advertiser article, I believe the Earl of Onslow committed that he would undertake to provide a high quota of affordable housing and retirement homes if any development were allowed to proceed. In addition, he made a commitment to build a school to serve the new community. All these facilities and services are compelling and in high demand locally.

Another benefit of Clandon Park is the traffic and infrastructure in the area is strong as it was put in place to support a growth if traffic from the original development of the golf club. Sadly, something that never happened but the roads are at least in place. The other benefit to this site is the existing park and ride which is a fundamental advantage. It demonstrates that the site is excellently located for transport and also that the site has already been identified as suitable in principle for development.

From the review of the Local Plan some of the other sites would seem to have disadvantages and material infrastructure issues and are also prone to flooding. Surely the events of recent years and the devastation caused by floods in areas where development has proceeded without full consideration of the flood risk must teach us all lessons. My understanding is that the Clandon Park area is not a flood risk area.

Clandon Park (as described in the Surrey Advertiser) would be developed as a Village garden community and consistent with the aims and objectives outlined in important government policy. No other site meets these criteria. The need for a solution to the local housing shortage as soon as possible is another major advantage of the Clandon Park site. The sites mentioned in the local Plan all seem to have long lead times before development could start and further delays need to be avoided if possible. Moreover, it would seem to me that there are fundamental uncertainties attached to the development of the other large sites which might preclude material development. For instance, the refusal of the Wisley planning application states that there are still "fundamental" problems with the highways. It would seem to me from a cursory knowledge of Clandon Park that it has no "fundamental" problems and it would seem sensible for GBC to include the site for the certainty of deliverability.

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:

Comment ID: PSLPA16/1596  Respondent: 15434241 / Valerie Sowerby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.

° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable. Why is this so?

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1593  Respondent: 15434273 / Brian Crosby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The SHMA report more than doubles the figure of 322 used in previous plans.

This figure cannot be verified because the council will not publish the SHMA report. There is a lack of transparency which is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1600  Respondent: 15434817 / Peta Hayden  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing
Construction on the Green Belt may not be necessary at all now that housing needs have fallen because of Britain’s imminent departure from the EU.

The council has estimated incorrectly based on flawed data—the SHMA figure has doubled from 4 years ago, and it is wrong on several counts, it fails to correct historical errors, it fails to account for immigration from the EU falling to zero after the BREXIT, it is flawed in the way student needs are considered and estimations in job growth post Brexit.

Waverley and Woking Borough Councils are sensibly applying REDUCTIONS to the proposed levels of housing growth, and so must Guildford Borough Council, BEFORE the earmarking of GREEN BELT countryside for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3228  Respondent: 15434817 / Peta Hayden  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As GBC did not properly account for how the reports’ figures were arrived at, and too short a period of consultation was given the Draft Local plan is unaccountable and therefore UNSOUND.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1603  Respondent: 15434881 / M G Waugh  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I disagree with the Council’s housing projection of a need for 693 houses per year (identified in the SHMA) for the period 2013-2033 when an independent report prepared by NMSS for Guildford Residents Association in June 2016 identifies that the Objectively Assessed Housing Need is nearer to 510. This reinforces my view that the statistical basis for the draft Local Plan is fundamentally flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1617  Respondent: 15437601 / Robert Legg  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is insufficient detail to justify the number of houses planned. The Plan is therefore flawed from outset.

I trust that you will take my objection into consideration when considering the Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1647  Respondent: 15438049 / David A Sprigings  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 a whole as I cannot support it when the Leader of the Council says (as he did at the Council meeting on 24/5/2016) that "given the size of this beast there is no way it is 100% correct". Whilst Councillor Spooner evidently thinks it is acceptable for the Local Plan to contain errors I and, I am sure, many residents of the Borough, do not agree, especially when those errors are errors of fact or contradictions of other statements in the plan or its supporting documentation. Some examples from documents on the Council website supporting the draft local plan, relating to areas close to my home (I haven't looked at other areas) are:

**From Guildford Borough Settlement Profiles:**

Send - Retail and employment:

Send village has a small parade of shops with flats above and there is a reasonable selection of convenience and comparison shops, including a post office, mini-supermarket, and sandwich bar.

Send - Transport:
A bus also goes to Kingston upon Thames 13 times a day during the week, with limited weekend service.

Send - How well the village works:
As a connected village, Send scores very poorly as public transport is limited.....

Send Marsh/Bumtcommmon: Retail and employment:
The only convenience shop within the settlement is located in a petrol station and located opposite the entrance to Boughton Hall Avenue.
Send Marsh/Burntcommon - Transport
There is a reasonable bus service.

Send Marsh/Burntcommon - How well the village works:
As a connected village, Send Marsh scores very poorly as public transport is very limited.

Although there are some local shops and businesses....

**From Major Village Expansion : Guildford Borough Green Belt & Countryside Study**

Send
Send has a bus service rating of 3 within GBC's settlement hierarchy and therefore has good public transport connections.

Send Marsh/Burntcommon
Send Marsh and Burntcommon is served by a good bus service scoring 3, as defined within GBC's Settlement Hierarchy.

In an earlier document The Villages Medical Centre, which is located on Send Barnes Lane, Send, was shown instead as being in Send Marsh.

**Inconsistencies:**

Send: The Settlement profile statement that "Send scores very poorly as public transport is limited" is totally inconsistent with the Green belt & Countryside Study Major Village Expansion comment that Send "has good public transport connections".

Send Marsh/Burntcommon: The Settlement profile statement that "Send Marsh scores very poorly as public transport is very limited" is totally inconsistent with the Green belt & Countryside Study Major Village Expansion comment that Send Marsh and Burntcommon "is served by a good bus service".

Also, the settlement Profile for Send Marsh/Burntcommon contradicts itself by saying under Transport "there is a reasonable bus service" and under How well the village works "Send Marsh scores very poorly as public transport is very limited".

So according to the Local Plan support documentation Send Marsh/Burntcommon:
- Has a reasonable bus service
- Scores very poorly as public transport is very limited
- Is served by a good bus service

One thing is for sure, you would find it very difficult to find anyone in Send or Send Marsh/Burntcommon who thinks that the bus service is good.

**Errors:**

Although it is correct to say that bus service 515 runs from Guildford to Kingston it is NOT CORRECT to say that this bus service serves Send village. A 515 bus travelling from Kingston to Guildford leaves the A3 after the M25, travels along Ripley High Street and Portsmouth Road, then turns left at the Shell Petrol Station roundabout onto the A247 towards Clandon and onto the A3. It DOES NOT go into the village of Send.

Although Send has a convenience store in the form of McColls, with the best will in the world this cannot be described as a mini-supermarket.

The Villages Medical Centre is in Send NOT Send Marsh - I confirmed this with Dr Burns when I identified this error in September 2014.
Send Marsh/Burntcommon Settlement Profile: How well the village works includes "there are some local shops". Where are they? The only convenience store is at the Shell Garage as mentioned elsewhere. There are no other "shops".

Although these errors may at first seem minor, they were very significant as the information was used in scoring the different villages for Local Plan purposes, resulting in erroneous scores for both Send and Send Marsh.

How can anyone trust the content of the Local Plan when there are such errors and blatant inconsistencies in the supporting information on which it is based? There are others, including saying that Global Companies have their headquarters in Guildford. One of those quoted is "Phillips". Having worked for the Dutch Philips Electronics Group for over 30 years I, unlike the Council, at least know how to spell Philips correctly and also that the Philips HQ in Guildford is that of the UK Philips organisation, the UK being only one of more than one hundred countries in which Philips operates, whilst the Global HQ of Philips Electronics is in the Netherlands and has been since 1891. Is the Council again trying to mislead the public?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2571    Respondent: 15438049 / David A Sprigings    Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )


ASP3 is "New A3/A3100/B2215/A247 Burpham-Burntcommon all-movements junction, formed by a new connector road linking new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10)".

This will have the effect of attracting even more traffic from Burpham and the proposed Gosden Hill Farm 2000 home, Park & Ride and Secondary School development to Send, Send Marsh/Burntcommon and Ripley than will already be attracted by the A43a proposed new A3 junctions onto and off from the A247 at the junction with B2215 London Road at Burntcommon, including even more traffic through Send and Send Marsh/Burntcommon to/from Woking and surrounding area.

I realise that such an "Aspirational" scheme is not considered as a key infrastructure requirement on which the delivery of the plan depends but as 5.91 on page 25 includes "However, we do consider that it is appropriate to promote these schemes at this time" I consider it appropriate to strongly object to scheme ASP3 at this time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1623    Respondent: 15438753 / Peter Fairbrass    Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
3) 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1635  **Respondent:** 15439425 / Abigail Cruse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

The Council will not publish the SHMA report so this figure cannot be verified? This lack of transparency is not right for consultation on 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:** PSLPA16/1672  **Respondent:** 15442049 / Ellouise Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1673  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1688  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

23. APPENDIX D
I OBJECT to the SHMA figure of 693 houses per annum in the Borough being too high (Appendix D).

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS (a housing demographics consultant) has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the Borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the Borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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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: PSLPA16/1697  Respondent: 15445665 / Jonathan Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) 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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1698  Respondent: 15445697 / Jane Mary Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. I would have hoped more facts about how the Council arrived at the number of houses required would have been more constructive but the Council appears not to be willing to be honest and open.
I OBJECT to the 2016 Draft Local Plan. I urge you to withdraw it and stop trying to force new development against the wishes of local residents and in a lot of cases common sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1701  Respondent: 15445793 / Jackie Withers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1705  Respondent: 15446401 / Louise Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 West Surrey Strategic Market Housing Assessment which is far too high.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1711  Respondent: 15446753 / David Boyce  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

14. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough. This is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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I trust that the objections made above are 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:

Comment ID: PSLPA16/1715  Respondent: 15448001 / Ann Dowdeswell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed new housing numbers. The Strategic Housing Market Assessment mathematical model has not been revealed in the plan. I am therefore confused as to how a population increase in the Borough, which is estimated at 70% higher than the official national estimates is calculated?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1716  Respondent: 15448193 / B. A. Howell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the potential enforcement of a Local Plan for mass house building across our Borough against the wishes of most of its inhabitants. The method used by the Government is inaccurate and crude, interested parties have used the house building policies of National Government to forward their own pecuniary ends. Alternative methodology and analysis seem to have been lost in the haste to bounce through this crude Plan. It is all based on private speculative development, in the present hiatus of post Brexit Britain, levels of net immigration are likely to fall drastically in the next 5 years as well as house sales through uncertainty. So forecasts based on crude figures of population growth via EU immigration, non EU immigration, illegal immigration and indigenous birth rates, will probably render a false outcome. The unnecessary destruction of our local and natural environments is there unwarranted in this rush for growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

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 Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1726   Respondent: 15448353 / Emily Roberts   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1727   Respondent: 15448385 / Edward Bates   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1729  Respondent: 15448449 / Carol Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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:
GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

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: PSLPA16/1786  Respondent: 15451969 / Rosie Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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:** PSLPA16/1791  
**Respondent:** 15452193 / Susan Hibbert  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I wish to state my objection to Guildford expanding by a quarter over the period of the proposed local plan. I believe that the housing target is set too high, based upon flawed data, and I object to the fact that GBC has declared that it will not be applying constraints - when every other Surrey borough has done so.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1793  
**Respondent:** 15452289 / Claire Miller  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1794  
**Respondent:** 15452449 / Carl Sjogren  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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: PSLPA16/1857  Respondent: 15454465 / Marissa Draper  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/1856  Respondent: 15454497 / Rick Parker  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/1855  Respondent: 15454529 / Janet Tarbet  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/1854  Respondent: 15454561 / Charles Dadswell  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/1844  Respondent: 15454945 / Claire Cassar  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/3604  Respondent: 15454945 / Claire Cassar  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I OBJECT the lack of evidence provided that we really need all this housing in the area? Definitely not on the scale proposed, from my experience new housing is, in the majority filled with people who are not from local areas but are from far afield attracted by the promise of better things but to the detriment of the existing local population who are drowning under the waves of this influx.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1812  Respondent: 15454977 / Graham Hook  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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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: PSLPA16/1843  Respondent: 15455009 / Emma Graham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1841  Respondent: 15455073 / Amanda Fletcher  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1840  Respondent: 15455105 / Kate Robinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1852  Respondent: 15455201 / Edith Dadswell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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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**Comment ID:** PSLPA16/1817  **Respondent:** 15455233 / Andrew Hamilton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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:** PSLPA16/1821  **Respondent:** 15455969 / Eloisa Latin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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:** PSLPA16/1822  **Respondent:** 15456129 / Jean Harding  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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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: PSLPA16/1825  Respondent: 15456225 / Ralph Bembridge  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to Guildford Borough Council's Draft Location Plan June 2016.

The situation is becoming 'out of band ' and a stop should be made to the unsustainability of the proposals which are flawed in many areas. SH M/

\ has indicated there is a housing need of 693 houses per year - why has it been doubled from this figure given only four years ago ? It is not right that GBC should refuse to indicate how the figures have been calculated. The public of Guildford deserve a realistic answer to this question - it is the very least you can do.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1826  Respondent: 15456353 / Peter Farrant  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This will lead to a loss of Green Belt and therefore make Burpham and surrounding areas a less desirable place to live. There is a lack of evidence for an increased housing development of this scale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4535  Respondent: 15456545 / Paul and Lynn Cozens  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We also feel that major plans like this should be put on hold. At present population numbers are uncertain. Until the UKs exit of the EU proceeds further we can not possibly accurately predict population numbers and housing need. This quantity of extra houses may well not be needed and calculations to prove this housing need must be published.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/1833  Respondent: 15457441 / Margaret Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6) I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3311  Respondent: 15458081 / K C Meldrum  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I am concerned and object to the housing need figure. I am aware that expert outside advice has been obtained on the former and their report has concluded that the housing need figure is far too high and should be not more than 510 new homes per year since the GBC figure does not cater for outgoing international migration nor has it been corrected for recent census information on house formation. I also understand that the modelling done for homes to support economic growth is plain wrong. On that basis the GBC figures should be put aside in favour of a figure of not more than 510 new homes per year.

2. I also object to the housing target that is also far too high since it doesn’t apply the necessary constraints- such as Green Belt- fully across the whole borough.

3. 1. I object to the costly plans for the Sustainable Movement Corridor as it will not be of any value to the residents of Merrow and a cost benefit study would demonstrate that it would not be value for money. I also object to the proposal for a railway station in Merrow since so little detailed information is provided and the proposal is not therefore sound.

2. I also object to the proposal for a railway station in Merrow since so little detailed information is provided and the proposal is not therefore sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1862  Respondent: 15458273 / Laila-Marie Latin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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<th>Comment ID: PSLPA16/1865</th>
<th>Respondent: 15458369 / Julia Latin</th>
<th>Agent:</th>
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<th>Respondent: 15459873 / Richard Horn</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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Appendix 1: Housing Need

Please refer to separately attached report by Neil McDonald of NMSS entitled, “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford.”

Neil McDonald is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues.

He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit until its closure in 2010. He left the Department in March 2011 and has since worked with the Cambridge Centre for Housing and Planning Research (CCHPR) as a Visiting Fellow (2012-15), collaborating in particular with its founder director, Professor Christine Whitehead.

Appendix 2: Transport Infrastructure Part 1 and Part 2

These reports, the first looking at highways and traffic, the second at transport other than the strategic and local road network, are prepared by Richard Jarvis BSc, MS, CEng, FICE, FCIHT.

Richard Jarvis is a retired planning and management consultant. He has many years’ experience as a transport planner, managing a wide range of projects in the UK and around the world. He led studies for highways, city planning and public transport. He has acted as an expert witness at public inquiries.

COMMENTARY ON THE PROPOSED SUBMISSION LOCAL PLAN AND TRANSPORT INFRASTRUCTURE

Highways and Traffic

1. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The Plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

2. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by SCC at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions in the borough from 2009 to date. It represents today’s circumstances, with the addition of growth in traffic to 2031...
outside the borough and in Waverley in line with their plan. The results for this scenario correspond to the current unsatisfactory traffic conditions in peak periods.

3. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the Plan. The Scenario 5 results show that there will be widespread congestion in the morning peak hour across the network in 2031. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11 will be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHAR results provide evidence that congestion will be worse in 2031 than it is today on much of the network.

4. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre.

5. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3), and those in Tables 4.3 and 4.4 with levels of service E and F that will not benefit from the improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’.

6. The cumulative effect of the additional traffic generated by the developments in the Plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we do not accept the conclusion that the developments would have ‘an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’.

The following comments regarding the strategic sites are taken from the SHAR:

- Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road/Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey Research Park and the RSCH through the development (para 4.7.3).
- Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8).
- Wisley Airfield – traffic will increase on minor roads to gain access to the A3 (N and S bound) and to other routes (para 4.7.11). The development will add more traffic to the A3. The Burntcommon slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14).
- Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Lane/B3000 junction, but increasing at the Puttenham Hill/Millbrook junction.
- Ash – development in Ash is not specifically addressed, but there are large increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction).
- Slyfield – there are no remarks relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted in error.
There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane

- Town Centre – the report has very little to say about the town centre. The model results forecast severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. There are no highway mitigation measures in the PSLP for the centre. In the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined in the SHAR, but traffic using the A281 from Waverley, for example, would be affected. The PSLP does include a new park and ride facility at Gosden Hill and the Sustainable Movement Corridor, which is discussed in a separate note.

1. The PSLP does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen.

2. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the PSLP. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, to which they are unsuited. The model results show an increase of 47% over 2009 in Scenario 5.

Appendix 2: Transport Infrastructure Part 2

COMMENTARY ON THE PROPOSED SUBMISSION LOCAL PLAN AND TRANSPORT INFRASTRUCTURE – part 2

1. Appendix C of the Plan includes the following categories of transport infrastructure in addition to the Strategic Road Network and the Local Road Network which are discussed in a separate note:

   - Park and Ride
   - Sustainable Movement Corridor
   - Bus Transport
   - Active Modes
   - Rail

   Each of these is considered below.

Park and Ride

1. There is one Park and Ride project in the Infrastructure Development Plan which is a new facility at Gosden Hill Farm. This is to be delivered by the developer of the site and the Transport Topic paper states that the intention is that it will operate without any public funding with 500-700 spaces. It is expected that the site will be use by drivers on the A3 southbound heading into Guildford town centre (TTP para 5.60). It is not clear how this ‘mitigates the traffic impact of the Gosden Hill Farm site’ (PLSP App C P&R1), though there could well be residents of the new development who may choose to use the P&R bus service. The Park and Ride facility is not related to the proposed new Merrow Station.

2. There is an absence of any park and ride proposal east of the town centre, which would surely benefit from one.

Sustainable Movement Corridor

1. This is an ambitious concept. Policy I3 in the Plan states that the SMC ‘will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists’. It will link the new developments in the west to those in the east via the town centre. It is estimated to cost £70-90m, with funding coming from developers and the Local Growth Fund. The recognition of the importance of sustainable travel is welcome. Connecting new developments to the town centre, as in the case of SMCI and SMC2, is sensible, but the need for a ‘corridor’ is unproven.
2. The latest information on the project has been supplied in a paper ‘Progress Update on the SMC Scheme’ published by GBC on 6 June 2016. This explains that studies have been carried out for sections 1-5 of the proposed route, and further work is needed. The SMC will use existing roads for the majority of its length, so this means that it will affect the allocation of carriageway between road users. Two design formats have been identified, ‘type 1’ involving separate lanes for the SMC, and ‘type 2’ in which bus priority measures are introduced at congestion sections and interchanges. The majority of the route is likely to be ‘type 2’ according to Table 1 of the Progress Update. This will be challenging because the road width on several sections will limit what can be achieved without a major impact on other traffic.

3. The Plan states in para 4.6.24, that ‘journeys will be rapid and reliable by bus and safe and direct on foot and by bike’. The ability to deliver rapid bus services in peak periods has not been demonstrated. There has been no quantification of the potential demand to use the SMC. Securing funding from the Local Growth Fund requires an economic justification.

Bus Transport

1. There are two projects in the Plan relating to buses. The first is labelled ‘New Guildford town centre bus facilities’. This is essential and the absence of a site for a bus station in the Plan is a serious weakness. Delivering a focus for town centre bus services and the SMC surely should be a key feature of town centre planning. The improvement of bus connections to the station is also needed.

2. The second project is for bus/rail interchange at Effingham Junction station (or Horsley) is desirable if the Wisley Airfield development proceeds.

Active Modes

1. The schemes listed are welcomed.

Rail

1. There six projects listed in the Plan of which four will be delivered by Network Rail as part of their investment programme. The other two are the new stations, Guildford East and West, which will increase rail access to development sites, and the hospital in the case of the West station, and are to be welcomed for that reason.

2. The Plan does not deal with the fact that the Portsmouth/London main line is extremely busy in peak periods. Commuters from Guildford to London frequently have to stand, and this is in spite of longer trains having been introduced. Capacity is limited in the area between Surbiton and Waterloo and this is the focus of Network Rail investment (project NR5) that is scheduled to start in 2029. The growth proposed in the Plan for Guildford will undoubtedly mean more people will want to commute, adding to pressure on the congested services, in the period before the frequency of services can be increased.

Appendix 3: University Student Housing

Background

Guildford is preparing its Local Plan and is trying to identify housing provision for the future. The Council has indicated that there is a particular problem in meeting short-term housing needs (years 1 to 5).

The University has approximately 14,000 FTE students, half of whom live off-campus. This means that around 7,000 students live in the town centre, occupying homes that could be made available for University staff and other key workers. The GRA believes that a policy by GBC to ensure that the University accommodates 80-90 per cent of its students on its existing campuses (which it could implement over the next three years without affecting any existing students) would greatly help the housing situation as it would quickly free up 1,000 - 2,000 lower-cost houses close to the Hospital, Research Park and University.

Dedicated student accommodation would provide a range of other benefits to students and to Guildford:

Better for students:
• **It is more affordable for students** - there are economies in providing dedicated facilities with communal areas, shared services (such as broadband access and shared laundry facilities). Currently students compete for accommodation on the open market meaning that landlords charge rent outside of term time (when students often do not require accommodation).

• **Dedicated accommodation would be more appropriate** - it is not unusual that a bedroom in a shared house may be no more than a box room perhaps with no windows, in a conservatory or cold attic. It is not unusual that flatmates need to pass through a bedroom to visit the bathroom, use the kitchen or even to get to the front door. Purpose-built accommodation does not present any of these problems.

• **Living on campus would be safer for students.** Some students are living in cramped, substandard conditions. The condition of dedicated student accommodation would be easier to regulate (provision for fire escapes etc). It is also easier to ensure safer travel for students at night through the provision of transport.

• **Students would have the benefit of a guaranteed residence throughout their studies.** Not all first-year students were allocated rooms on campus last year and many struggled to find accommodation in the town, which caused stress.

• **Students can still enjoy the benefits of town life.** Unlike many universities, the University of Surrey’s main campus at Stag Hill is just a stone’s throw from town centre so students will not miss out on Guildford’s nightlife etc.

• **Students perform better** - Several US studies have shown that students who live on campus perform better academically than those who live off-campus (see http://www.iub.edu/~caepr/RePEc/PDF/2010/CAEPR2010-002.pdf)

Better for Guildford:

• **There would be fewer traffic movements, and fewer problems with students parking in residential areas.** Students living on campus are less likely to bring cars. (In parts of Ashenden there are four cars per student house) NB. In 2002, the University promised that Manor Park would be a “world-class car-free campus”.

• **If there were a dramatic swing in student numbers in the future, voids in student residences could be passed back to offer homes for local people, such as nurses.** Plans for the new student accommodation at Walnut Tree Close already allow this.

• **There will be improvements in neighbourhoods vacated by students, such as Onslow Village and Park Barn, when the houses provide accommodation for families and key workers throughout the year.** Businesses in Guildford Park Avenue have struggled and some have closed down because local houses are occupied for just 30 weeks of the year. It would also help to tackle issues (described in the Local Plan Issues and Options document) “with noise and disturbance, car parking and sometimes with the general upkeep of the rented property”

• **Under a 2004 Section 106 agreement (Section 15), Hazel Farm will be released by the University to provide housing for Guildford once 2,500 units have been built on Manor Park.** Whilst the site cannot be used for family housing (because of its proximity to Whitmore Common SPA), Natural England would allow the site to be used as a care home. The usage would seem appropriate given the ageing population often cited as being a reason for population growth, and it would help towards Guildford’s housing supply numbers.

Is this a viable option?

• **There are precedents for having nearly all students live on campus** - seven out of the top-10-ranking US universities accommodate more than 86% of students on campus - Harvard has 98%. In the UK, Oxford City Council’s Local Plan includes a policy which limits the number of students in the private housing market to 6,000 out of a student population expected to reach 40,000 in the near future.

• **The University has ample space on its Manor Park and Stag Hill campuses to provide this accommodation.**

• **There would be no cost to the University.** The University could opt for a lease/leaseback deal with Unite (one of the main student accommodation providers), which would include a five-year fix on student rent with a pre-emption on buy back for the University.

Some numbers in detail:

According the the University website, it provides the following number of beds:
Stag Hill: 3,002
Hazel Farm: 349
Manor Park: 1665
Total: 5,016

From the 2011/12 Financial Review, there are the following students:

Undergraduates: 10,878
Postgraduates: 3,157
Research: 1,174

Total: 15,209 (NB this includes some part-time, so the Full Time Equivalent (FTE) number is 13,576)

Student preference is an argument that the University has used in order not to build its student housing.

1) The majority of students attending Oxford University are not given the option to live in shared accommodation in town, and this does not prevent them wanting to go there.

2) Many students actively want to live on campus and want the security of knowing that they have a roof over their heads for three years. The student halls are filled every year. A number of students, for example in Onslow Village, would have preferred to remain on campus, but say they were unable to do so.

3) 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.

4) GRA is not being suggested students currently attending UniS should be forced onto campus. This policy would only affect future students, ie 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.

5) 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.

Appendix 4: Link between Infrastructure and Development

Letter and Reply

Cllr Paul Spooner
Leader of the Council and
Lead Councillor for Planning and Regeneration  
Guildford Borough Council  
17 May 2016

Dear Paul

**Link between infrastructure and development in the Local Plan**

**Site Allocation Policies A24, A25, A26 and A35**

Following the Executive meeting on 11 May, I am writing to ask you to change the wording of your proposed policies designed to make development of strategic sites contingent on timely delivery of infrastructure.

We are concerned that the very strong statements being made by the Executive, that permission will not be given for development without requisite infrastructure being in place, are not reflected in the Plan. We ask for this to be put right before the Proposed Submission Local Plan is issued for consultation by the Council.

Could you please ask your lawyers to provide a stronger formula than have regard to which is simply too weak and will not work. Much time has been spent in Parliament firming up intentions that a have regard to clause has failed to deliver.

- Developers will drive a proverbial coach and horses through “regard will be had to the delivery and timing of delivery of”.
- There is also a danger that “or otherwise alternative interventions which provide comparable mitigation” will be used to justify a sticking plaster approach and to avoid investment in durable measures.
- We are also concerned that, as worded, the much needed Site Allocation policies on infrastructure could undermine the first paragraph of Policy I1 which states that “infrastructure needed to support development should be provided and available when first needed to serve the occupants and users of the development.” and “Where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused.”

Weaknesses in the policies are made all the more critical by:

- the quantum of development proposed in combination with the scale of the infrastructure deficit identified by Surrey County Council
- the small proportion of infrastructure scoped, costed and in approved programmes
- conversely, the majority of infrastructure required being as yet poorly defined and reliant on inclusion in programmes beyond the current Spending Period, being either at the tail end of, or beyond, the Plan period.
- the poor track record of infrastructure being delivered in practice during the Structure and Regional Planning eras. The intention may be there to improve this under the new arrangements but the new system is untested.
- the immature status and lack of clarity around local infrastructure schemes.
- the possibility that decisions on planning permission will be made by inspectors, and not Guildford Borough Council, and that development may be determined at the outset by a new category of “in principle” permission.

Given this context, it seems to us that you are asking residents to take much on trust. In view of your clearly genuine intention, as Council Leader, to ensure that development is contingent on infrastructure being in place when required, we ask you to ensure your Policies A24, A25, A26 and A35 are redrafted to achieve this.

Kind regards

[redacted]
Hi Amanda,

I had seen this and asked Planning Policy to consider this as a consultation submission for review. To be absolutely sure please also resubmit during the formal process!

I agree with the sentiments of the letter.

Best regards

Paul

Cllr Paul Spooner

Leader of the Council

Portfolio responsibility for Planning and Regeneration

Councillor representing Ash South, Ash Green & Tongham

Guildford Borough Council

[redacted]

www.guildford.gov.uk

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: LOCAL PLAN GRA Report FINAL.pdf (1.6 MB)
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D).

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling, so there is no transparency to this evidence base. This is undemocratic as those affected by the plan are unable to ascertain its accuracy.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

Please ensure my comments are shown to the Planning Inspector, before he/she makes his decisions. I request confirmation that you have received this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1956  Respondent: 15462497 / Liberty Lawson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The SHMA, a source of figures have been used in the development of the local plan have been proven inaccurate, and hence, the SHMA (and therefore the expected need of housing stock needs to be revisited. Additionally with the effect of the UK’s decision to leave the EU and the expected decrease in immigration this will bring has not been included in the SHMA or therefore the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1966  Respondent: 15462785 / Thomas McMinn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

18. OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology I believe is inaccurate; inflating the needs of the borough by distorting student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and...
significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1972  Respondent: 15463713 / Tracey Broadhurst-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1973  Respondent: 15463777 / Jade Broadhurst-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/1974  Respondent: 15463841 / Jessie Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1982  Respondent: 15464193 / Matthew Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/1983  Respondent: 15464353 / Tracey Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/1985  Respondent: 15464481 / David Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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:** PSLPA16/1986  **Respondent:** 15464577 / Andrew Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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:** PSLPA16/1998  **Respondent:** 15464673 / Trudy Grey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

23. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2008  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I consider the calculation of housing need is The model has not been scrutinised and fundamental assumptions are flawed. Housing target is unconstrained;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2012  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2020</th>
<th>Respondent: 15466945 / A M Wagstaff</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</tbody>
</table>

1. I object to the lack of evidence that this development is needed in this area.

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Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2022</th>
<th>Respondent: 15468097 / Allan Hempstead</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<tr>
<th>Comment ID: PSLPA16/2023</th>
<th>Respondent: 15468161 / Jane Bell</th>
<th>Agent:</th>
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<tr>
<th>Comment ID: PSLPA16/2031</th>
<th>Respondent: 15468609 / Lesley Lane</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Attached documents:

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Comment ID: PSLPA16/2041  Respondent: 15469249 / Daniel Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/2048  Respondent: 15470145 / Linda Eyre  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

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Comment ID: PSLPA16/2047  Respondent: 15471489 / P Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/2052  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2071  Respondent: 15473793 / Helen Norman  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 Guildford Borough Council’s Draft Local Plan June 2016 it is unsound for the following reasons

Housing numbers

The proposed increase in house numbers in Burpham alone is 40% of the total proposed in the Draft Plan – this is a disproportionate amount and there should be a fair distribution around the whole of Guildford not just in one section. The Council has refused to provide details of how these numbers have been calculated and brings into question the true strength and reliability of these figures, as they cannot be independently verified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2074  Respondent: 15474785 / Jules Widdowson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The way in which the Plan uses the proposed increase in demand for skilled labour in Guildford as a justification for the number of new homes. Where the proposed increase in labour will come from is not substantiated. Indeed, the recent Brexit vote means that the projected numbers need to be revisited and most likely scaled back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2078  Respondent: 15474849 / Timothy Yorath  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2081  Respondent: 15475297 / Jane Patricia Chandler  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2090  Respondent: 15476289 / Gregory Heffer  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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 numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/2108  Respondent: 15477665 / S.J. Wilkins  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**


1. Number of houses required.

I disagree with the number of houses required in this plan.

The quoted number of houses required (from the SHMA) is 693. Much uncertainty seems to surround this figure in that it is too high, and double the figure given only four years ago.

The proposed number of 14,000 houses is unsustainable, resulting in over development around Guildford. It also proposes a disproportion of development to the north of Guildford, greatly affecting Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/2109  Respondent: 15477729 / Julia Hoar  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Where is the evidence of the numbers provided by SHMA – if you do not show us how you arrived at these huge numbers I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2127  Respondent: 15478177 / Michelle Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may well conclude that the consultation has not been properly conducted. The Council should also consider the impact that objections (which will inevitably be made) on any planning applications on these sites will have on its capacity to deal with planning matters.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2144  **Respondent:** 15479201 / Nick Norton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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**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 the HRA and its Appendixes A, B and C

**Summary**

The HRA omits vital evidence and fails to fully assess the cumulative impact of all proposed development in the 400m-5km TBHSPA mitigation zone.

- It fails to show any base line 'real world' air pollution evidence.
- It pre-determines whether Natural England will act to approve both strategic and "bespoke" SANG submitted for planning approval.

- It demonstrates that Policy S2, H3, P2, P3, E1, E2, E4-9, I3 (13 out of 27 Policies = 50% approx of all policies) have an impact on TBHSPA but this is not referred to in the conclusion.

- It demonstrates that the majority of sites in 400m-5km mitigation zone need special HRA evaluations to be carried out (63 out of 82 sites in total [77%]) but this is not referred to in the conclusion.

- It fails to include an evaluation the most recent visitor survey of TBHSPA 2012/13 (see below)

**Key Points of Objection**

1. I object to the omission of 2012/13 Natural England survey of visitor numbers to the TBHSPA report from the HRA

The HRA fails to list the 2012 Natural England Survey of Visitors to the TBHSPA as material evidence (Natural England Commissioned Report NECR136 Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA), First Published 13
February 2014; Natural England Project Manager - Patrick McKernan, Natural England,
Guildbourne House, Chatsworth Road, Worthing, West Sussex, BN11 1LD
Contractor - Footprint Ecology, Forest Office,
Cold Harbour, Bere Road, Cold Harbour, Wareham, BH20 7PA).

1. I object to the failure of the HRA to examine the observed visitor trends between the 2005
NE Visitor Survey and the 2012/13 NE Visitor Survey
The 2012 NE visitor survey reports a 10% increase in visitor numbers. This is neither
considered nor critically appraised as a contribution to the analysis of success or failure of
the TBHSPA Avoidance Strategy 2009-2014 and the implications for Policy P2, P5, E8 and
E9.

1. I object to the failure to present evidence in the HRA whether or not current SANG or
SAMMS policies are effective
The HRA fails to assess whether SANG and SAMM current policies and programmes are
effective, either independently or in combination, in attracting visitors, cross-country
cyclists and dog-walkers away from TBHSPA. On enquiry, Natural England admitted they
have no such survey evidence for TBHSPA SANG or SAMM programmes.

1. I object to the failure to properly assess the potential impact of disturbance and predation
rates by newly introduced pet populations (dogs and cats)
The HRA fails to assess in detail, with associated numerical calculations and a described
methodology that can be independently verified, the cumulative potential impact on
disturbance and predation rates within TBHSPA by the introduction of domestic pets (dogs
and cats) from new dwellings; the introduction of over 8,000 dwellings within the 400m-
5km mitigation zone will give rise to over 19,000 human inhabitants (ONS 2.4 people per
household).
A survey of households carried out by a veterinary team at Bristol University in 2010
“Number and ownership profiles of cats and dogs in the UK” published in the Journal of The
British Veterinary Association (Veterinary Record 2010;166:163-168 doi:10.1136/vr.b4712
Authors: J. K. Murray, BScEcon, MSc, PhD1, W. J. Browne, BSc, MSc, PhD1, M. A. Roberts,
BVM&S, MRCVS2, A. Whitmarsh1 and T. J. Gruffydd-Jones, BVetMed, PhD, MRCVS1)
indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 8,000+ new homes), the cumulative impact of dog ownership (up to an estimated 2,500 new dogs and 2,000 new cats within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase.

1. I object to the lack of direct measurable observations of the level of critical components of air pollution in the HRA

The HRA fails to present any actual evidence of current air pollution levels derived from roadside monitoring on critical routes within the 400m-5km TBHSPA mitigation zone (e.g. A324, A320, A321, A323) so as to set an acknowledged and proven base line from which to measure future incremental impacts on air pollution from the proposed housing developments and associated traffic movements; the introduction of associated vehicle ownership with its potential to increase NoX and CO2 in the 400m-5km mitigation zone; and over 10,000 vehicles (ONS 1.25 vehicles per household) in the 400m-5km mitigation zone

"Section 10.4 Only mathematical modelling of air pollution has been carried out. There has been no physical evidence collected on the main feeder routes so there is no actual physically measured base level on which to judge neither the current nor incremental air pollution impact in the 400m-5km mitigation zone."

Simply modelling air pollution and declaring the model output as actual air pollution levels is irrational and non-sensical. Physical measurement must be carried and the evidence presented for further public consultation to be based in sound science, not speculation.

If applied to the human population, it has been estimated that sources of automotive air pollution account for approximately 5% of premature deaths (The WHO’s health risks of air pollution in Europe (HRAPIE) report put the equivalent mortality increase for NO2 at 5.5%.) and among the 19,000 new inhabitants proposed in the this Local Plan in the 400m-5km TBHSPA mitigation zone this represents a premature death incidence over time
of some 1,000 individuals.

1. I object to the lack of detailed assessment of 50% of all proposed Policies and 77% of sites under the Impact Pathways in advance of policy formation.

Under the Sustainable Employment Sites (Policy E1) the following sites require special site level HRA but no attempt is made to evaluate this in advance to advise policy formation.

Office (B1a) and R&D (B1b) Strategic Employment Sites (1 out of 6 sites)

- Pirbright Institute

Industrial (B1c, B2 and B8) Strategic Employment sites (2 out of 10 sites)

- Lysons Avenue, Ash Vale
- Henley Business park, Normandy

District Centres (Policy E8) (3 sites)

- Wharf Road, Ash
- Station Parade East Horsley
- Ripley

Local Centres (Policy E9) (14 sites)

- Aldershot Road, Westborough
- Collingwood Crescent, Boxgrove
- Kingpost Parade, London Road, Burpham
- Epsom Road, Merrow
- Kingfisher Drive, Merrow
- Madrid Road, Guildford Park
- Southway, Park Barn
- Stoughton Road, Bellfields
- The Square, Onslow Village
- Woodbridge Hill, Guildford
- Woodbridge Road, Guildford
- Worplesdon Road, Stoughton
- Ash Vale Parade, Ash
- The Street, Tongham

Rural Local Centres (Policy E9) (3 out of 6 sites)

- Bishopsmead Parade, East Horsley
- Effingham
- Fairlands, Worplesdon

Site Allocations within 400m-5km mitigation zone (40 out of 43 sites)

- Guildford Town Centre

o Sites A1-A8, A10-A12 (11 out of 12 sites)

- Guildford Urban Area

o Sites A13-A20, A22-A26
• Ash & Tongham (3 out of 5 sites)
  o Sites A27-A29
    • Previously Developed Land in the Green Belt (3 sites)
  o Sites A32-A34
    • New Settlement (1 site)
  o A35
    • Villages (12 sites)
  o A36-A47
    • Traveller & Travelling Showpeople Sites (10 sites)
  o A48-A57

The HRA states "7.2.5 Due to their close proximity to the SPA (or the potential for developments in such close proximity to be facilitated by these policies), the above proposed policies/locations have potential to result in dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff during both construction and operation. Projects within 400m of the SPA that are to be brought forward under these policies will therefore need to be accompanied by Habitat Regulations Assessment that will investigate these impacts in detail."

"These impact pathways cannot be investigated in detail at the Local Plan level as they are related to detailed design and construction method."

This statement is an avoidance of more detailed consideration of environmental impacts in the construction and operational phase of each site in order to permit residents more appreciation of the impacts. If AECOM can model supposed air pollution levels then AECOM can model the impact of dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff during both construction and operation. GBC have failed to undertake suitable briefing of AECOM and have failed to take account of potential environmental disruption in advance of policy formation.

I propose that to remedy these failings the final sentence of paragraph 7.2.5. should read "These impact pathways will be investigated in detail at the Local Plan level by using appropriate modelling to illustrate the environmental impact of each site during..."
construction and operation. The methodology and assumptions of the model proposed shall be available for public scrutiny. The resulting model output shall report on the following parameters; dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff; and be prepared in advance of the Regulation 19 Examination in Public and submitted as part of the Guildford evidence base for the Guildford Local Plan, Proposed Submission.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2165  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPA16/2399  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2167  Respondent: 15479777 / Alexandra Trebilco  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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**Attached documents:**

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**Comment ID:** PSLPA16/2211  **Respondent:** 15480641 / Gillian Battams  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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**Comment ID:** PSLPA16/2164  **Respondent:** 15480673 / Simon Broadhurst-Jones  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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 the housing number of 693 houses per year form 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.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2212  **Respondent:** 15480769 / Caroline Battams  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPA16/2219   Respondent: 15481089 / Ann Stone   Agent:

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Comment ID: PSLPA16/2221   Respondent: 15481185 / Ray Avery   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPA16/2220   Respondent: 15481217 / C R Avery   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

0 The "objectively assessed need" figure of 693 homes a year is too high.

0 A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to

0 failure to correct for errors in the historical data for international migration flows,

0 issues with the way it considers students and affordability and

0 flaws in the method for estimating the number of homes needed to support job growth.

0 It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The following additional technical documents have also been prepared in support of these representations:

- Design Document, prepared by LDA Design; and
- Sustainability Note and accompanying plans, prepared by Vectos.

A copy of both technical reports is provided at Appendix 3 and 4.

**The Guildford College Group and the Liddington Hall Site**

The Guildford College Group (comprising Guildford, Merrist Wood and Farnham Sixth Form Colleges) is the largest College of Further and Higher Education in Surrey and one of the largest employers in the Guildford area.

The College Group covers all government funded sectors: general further education, higher education, land-based and sixth form. It currently enrols around 10,000 students per annum made up of school leavers, apprentices, adults and employers onto a broad curriculum across 15 sector skills areas, with courses ranging from supported learning/entry level to degree level programmes.

The College works with over 1,500 local employers, as well as universities, schools and other stakeholders to meet skills needs and currently has around 700 apprentices. With its broad offer which includes community outreach and special needs, the College has a positive social as well as an economic impact on the local community.

Although well-regarded, some of the facilities at Guildford and Merrist Wood have fallen behind other colleges and are no longer fit for purpose by modern teaching standards. This restricts the College from being able to develop its curriculum to meet the needs of the Local Enterprise Partnerships’ future skills agenda.

The College has no direct access to further funding to facilitate these future vital improvements and therefore needs to look to alternative means for investment. The only way the College can fund the improvements is by selling some of its own assets and reinvesting the money back into the programme of works.

The College believes that improvements to the facilities would allow them to increase and diversify the curriculum offer, thereby increasing student numbers and also enabling them to draw more revenue from commercial interests, which in turn would make them more self-sufficient in terms of future funding.

To allow this to happen, they are reliant on bringing forward a sensitive and suitable residential development at Liddington Hall as an urban extension to Guildford. A Site Location Plan of the site is provided at Appendix 1.

Guildford College are relying on funds being from the future sale of land at Liddington Hall to secure much needed improvements to its main Guildford and Merrist Wood campuses.

Consequently, Guildford College has been promoting their site, Liddington Hall through the Local Plan process for the past few years. The earlier (Regulation 18) version of the Draft Local Plan identified Liddington Hall as a potential housing (650 homes) and travellers site (site ref. 78 in Land Availability Assessment February 2016).

However, Liddington Hall has been removed from the latest Proposed Submission (Regulation 19) version of the Local Plan. This is surprising given that:

- The site is in a sustainable location on the edge of Guildford and within easy reach of the Fairlands Estate. It is well-served by local bus routes with good cycling connections to the town centre. It is within walking distance of the local facilities in Fairlands;
- In view of the potential capacity of the site (as acknowledged by the Council) for approximately 600 dwellings, there is the potential to further enhance the connectivity of the site for sustainable modes of transport as part of any redevelopment of the site;
- The existing footpaths already connect the site back in to adjoining residential areas;
- The site is effectively surrounded on three sides by existing development and two streets of existing development extend into the site from Aldershot Road;
- The substantial tree belts and small copses on the western and southern boundary, together with the settlement edges and road corridors on the northern and eastern boundaries establish a sense of containment to the site;
• The site has clear defensible boundaries and an appropriate Masterplan for the site could provide a robust green edge;
• The site has a very limited role in preventing the merging of Guildford and Fairlands;
• The site has only a limited role in containing the sprawl of urban areas;
• The site plays no role in preserving the setting and special character of an historic town;
• The site is not subject to any landscape-related, ecological, archaeological or heritage designations;
• None of the land is high grade agricultural land (predominantly grade 3 with some grade 4);
• The site is not a flood zone;
• The land is under single ownership (the college). The college would be committed to bringing forward the site as soon as the Plan is adopted;
• Residential development of the site would be compatible with adjacent residential land uses;
• There is sufficient existing highways capacity to accommodate development;
• Appropriate access into the site can be achieved; and
• The site is available for development and deliverable within 1-5 years, with no insurmountable obstacles to delivery in terms of infrastructure, highway improvements, ground contamination or ecology.

Soundness

Paragraph 182 of the National Planning Policy Framework (NPPF) states that a local planning authority should only submit a plan for examination which it considers to be ‘sound’, namely that it is:

• Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
• Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
• Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The representations demonstrate that the Draft Plan as currently worded is not sound because:

• It is not positively prepared as it fails to adequately meet Guildford’s housing need and does not aspire to exceed minimum requirements and build in flexibility;
• It is not justified as it is not based on a robust spatial strategy to meet housing need;
• It is not effective as it is unlikely to deliver enough new homes over the Plan period and at the right time; and
• It is not consistent with National policy or planning practice guidance as it focuses on the protection of the Green Belt over the presumption in favour of sustainable development and the environmental capacity of sites to accommodate appropriate development and the proper distribution of development around the Borough.

In these representations we set out the changes which will need to be made to the Plan to make it sound, including the re-insertion of our client’s site, land at Liddington Hall as a site allocation.

The case for Liddington Hall

Green Belt Sensitivity

As confirmed in the LDA Design Green Belt Assessment (Appendix 3) the site has a very limited role in preventing the merging of Guildford and Fairlands and also in containing the sprawl of urban areas. Furthermore, it plays no role in preserving the setting and special character of an historic town.

Removal of the site from the Green Belt would not compromise the integrity and screening function of retained vegetation despite a narrowing of the physical gap between settlements.
As demonstrated by LDA Design a new permanent and definable boundary could be established along Gravetts Lane and the A323 which would be more effective in the long term in preventing further creep of development into the more sensitive rural landscape to the west.

**Sustainability credentials**

The Green Belt Volume II Addendum at Appendix 6, gives Liddington Hall a total sustainability score of 8.57 and ranks it 8 out of the 16 appraised sites. Based on this scoring and ranking it decided to include the site in the earlier iteration of the Local Plan.

Vectos have carried out a review of the sustainability of the Liddington Hall Site compared to the other key strategic sites being progressed by the Council and have demonstrated that Liddington Hall is in a more sustainable location, in transport terms, compared to these sites, with scope to deliver meaningful transport improvements.

It is well-served by local bus routes with good cycling connections to the town centre. It is also within walking distance of the local facilities in Fairlands.

The site already benefits from footpaths which connect the site back in to adjoining residential areas. These could be upgraded as part of any redevelopment to enhance pedestrian and cycle connectivity further.

In view of the potential capacity of the site (as acknowledged by the Council) for up to 600 dwellings, there is the potential to further enhance the connectivity of the site for sustainable modes of transport as part of any redevelopment of the site.

**Environmental Capacity**

The Liddington Hall site scores well in terms of its Environmental Capacity. The Council has acknowledged in its own Environmental Capacity Analysis (Appendix 3 of Guildford Borough Green Belt and Countryside Study Volume II Addendum) that:

- There are no landscape related designations on any of the land parcel;
- There are no archaeological or heritage designations in place on the land;
- None of the land lies within an area liable to flood;
- None of the land is high grade agricultural land (predominantly grade 3 with some grade 4);

In view of lack of constraints the Council have identified that the majority of the open land within the site comprises a potential development area with an estimated capacity of 600 homes.

**Deliverability**

Land at Liddington Hall has been in the single ownership of the Guildford College Group for 50 years and therefore the site is available for development immediately (ie within Year 1-5 of the Plan Period) without any insurmountable obstacles to delivery.

The site has been promoted through the Local Plan process over a number of years, and has previously been identified as a suitable location for housing within previous iterations of the Land Availability Assessment (LAA) subject to release from the Green Belt;

Not only would the funds raised by the disposal of the land be entirely re-invested to provide improvements of Guildford College, the redevelopment of the site would help plug the gap in the earlier phases of the plan period.

**Summery**

For all of the above reasons we consider that land at Liddington Hall should be re-inserted as a site allocation under Policy S2 of the Plan.

**Conclusions**
The Draft Plan as currently worded is not sound because:

- It is not positively prepared as it fails to adequately meet Guildford’s housing need and does not aspire to exceed minimum requirements and build in flexibility;
- It is not justified as it is not based on a robust spatial strategy to meet housing need;
- It is not effective as it is unlikely to deliver enough new homes over the Plan period and at the right time; and
- It is not consistent with National policy or planning practice guidance as it focuses on the protection of the Green Belt over the presumption in favour of sustainable development and the environmental capacity of sites to accommodate appropriate development and the proper distribution of development around the Borough.

In order to prepare a sound Core Strategy, the council should plan for more homes with greater flexibility and selection of sites should be based more on the purported spatial strategy adhering to sustainable development rather than the slavish protection of Green Belt. In any event, the Green Belt Assessment should be re-examined in terms of methodology and results. This would result in a more rounded and robust selection of sites, including the re-insertion of land at Liddington Hall as a site allocation under Policy S2 of the Plan.

**Examination in Public**

We wish to appear at the forthcoming Examination in Public to present our case on this matter.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
- 22680003_Land at Liddington Hall Part3.pdf (8.8 MB)
- 22680003_Land at Liddington Hall Part2 (1).pdf (9.4 MB)
- 22680003_Land at Liddington Hall Part1 (1).pdf (1.1 MB)
- 22680003_Land at Liddington Hall Part4.pdf (8.0 MB)

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**Comment ID:** PSLPA16/2296  **Respondent:** 15483553 / Robert Bastable  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I object to the figure of 693 houses per annum in the borough being too high (Appendix D) GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/2299  **Respondent:** 15483713 / Claire Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I object to the figure of 693 houses per annum in the borough being too high (Appendix D)**
GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation. Also it's clear that affordable houses in this area are still too expensive for those with jobs in the state sector so this is really building more executive homes for London commuters. Preserve our green belt, please don't build on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Housing numbers:

Regarding housing numbers the Strategic Housing Market Assessment has given a housing need of 693 per year, this is far too high and is double the figure given just 4 years ago.

Guildford Borough Council have not given details of how the figures have been calculated, the report is therefore unaccountable so should not be used.

The SHMA is fundamentally flawed, historical errors have not been corrected, there are issues over student housing requirements and errors in the estimation of homes needed to support growth.

By contrast the independent report by Guildford Residents Association comes up with a much lower figure of 510.

All other boroughs have reduced the figure that their SHMA came up with, Guildford have taken the highest number. Why have Guildford not constrained the figure?

The proposed 14,000 homes is a massive increase on the current housing stock, this is overdevelopment and is unsustainable. No justification has been put forward for such a massive increase in one town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2322  Respondent: 15485217 / Fiona MacKenzie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

the lack of evidence for the alleged housing need numbers (693 a year), and no real explanation as to why The 'Plan' allows for such a disproportionate level of development in one area of the Borough. In light of the recent vote for Brexit the need for new homes will probably reduce, and we may also be facing a crash in the property market, in the not too distant future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2323  Respondent: 15485281 / Fiona Stobart  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am concerned by the lack of any evidence for the alleged housing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
   
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

   As the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the lack of any evidence that this housing is required in such numbers.</td>
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<td>I object to the Local Plan which is currently out for consultation. There are so many aspects of the Plan which are not acceptable. To list them all would take up an inordinate amount of your time reading, comprehending and responding to. Therefore I will just list the most obvious parts of the Plan which are unacceptable paying particular attention to those affecting the local parishes of Send, Clandon &amp; Ripley:-</td>
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<td>• I object to the use of a “Black Box” method which has been used by GBC to derive the housing target. I attended a meeting where the leader of the Council was unable or unwilling to shed any light upon the methodology or parameters used within the model. The annual number of new homes required quoted in the draft Local Plan exceeds the needs of residents.</td>
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<td>• I object to a Local Plan which does not factor in the housing stock released due to students, currently renting from private landlords, no longer taking out leases from the private sector due to falling student numbers and additional direct University Housing Capabilities.</td>
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Comment ID: PSLPA16/2409  Respondent: 15487553 / Nicholas Eager  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2410  Respondent: 15487585 / Debbie Eggleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2411  Respondent: 15487617 / C Sheriff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2412  Respondent: 15487649 / Paul Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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<th>Comment ID: PSLPA16/2379</th>
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The flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/2385</th>
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Comment ID: PSLPA16/2389  Respondent: 15495201 / Viliv Viana  Agent:
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Comment ID: PSLPA16/2391  Respondent: 15495233 / Harriet Philips  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Comment ID: PSLPA16/2401  Respondent: 15495297 / Daniel Perkin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Comment ID: PSLPA16/2543  Respondent: 15495617 / Peter Elliot  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2420  Respondent: 15495649 / Stephen Cruse  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

The Council will not publish the SHMA report so this figure cannot be verified? This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPA16/2554  Respondent: 15495681 / Pippa Mathews  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2422  Respondent: 15495745 / David Williams  Agent:
The plan is based on the use of out of date estimates of population growth. These population projections used to underpin this entire plan were recognizably wrong at the outset and there is major doubt concerning housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2553  Respondent: 15495777 / Michael Lowe  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2423  Respondent: 15495809 / Katie Critchlow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2552  Respondent: 15495841 / Nicholas Fox  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:
Comment ID: PSLPA16/2551  Respondent: 15495905 / Emma Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2424  Respondent: 15495937 / C Aruncel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2425  Respondent: 15495969 / Olivia Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2550  Respondent: 15496001 / Ryan Hookind  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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<th><strong>Respondent:</strong> 15496033 / Sophie Hart</th>
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Comment ID: PSLPA16/2435  Respondent: 15496961 / Felix Jeffreson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2562  Respondent: 15496993 / nigel stirraker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2558  Respondent: 15497057 / S McMarken  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2437  Respondent: 15497377 / David Freeborough  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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<td>I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)</td>
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<td>The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.</td>
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<tr>
<td>The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.</td>
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Comment ID: PSLPA16/2452  Respondent: 15498049 / Natasha Howard  Agent:
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Comment ID: PSLPA16/2460  Respondent: 15498241 / Faye Church  Agent:
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Comment ID: PSLPA16/2463  Respondent: 15498369 / Kris Steadman  Agent:
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Comment ID: PSLPA16/2467  Respondent: 15498785 / Catherine Elingworth  Agent:
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<tr>
<td>3.There is an ERROR in the Land Availability Assessment dated February 2016, and I ask that GBC corrects this. There is a plan on page 299 that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will not be granted. MCRA would oppose any change to the character of this very quiet road. The road and the verges are narrow and are not suited to any growth in traffic.</td>
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Comment ID: PSLPA16/2491  Respondent: 15500161 / Joanna Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2481  Respondent: 15500449 / John Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. There is an ERROR in the Land Availability Assessment dated February 2016, and I ask that GBC corrects this. There is a plan on page 299 that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will not be granted. MCRA would oppose any change to the character of this very quiet road. The road and the verges are narrow and are not suited to any growth in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2482  Respondent: 15500513 / Alex Illingworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The council relies on a strategic housing making assessment that is in question. The council have not scrutinised the figure provided and rely purely on the fact that other councils have used the consultant GL Hearn to assess the housing need. The SHMA appears to be exaggerated against ONS data. Two independent reviews have identified similar faults, which suggest that the figure is too high and inaccurate. They also identify that the recent referendum result relating to Europe may have an impact on economic growth and consequently should be reviewed. The SHMA must be reviewed to ensure that it is accurate before the housing figure is agreed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the use of the 'Green belt and countryside study 2014' within the evidence base. This is a subjective view of the green belt provided by one company, It is not evidence. It does not provide exceptional circumstances to remove land from the green belt.

I OBJECT to the use of the transport study within the evidence base. The SINTRAM model is designed for major routes and is not suitable for local roads as it takes no account of junctions. The three hour period also skews the data disproportionately downwards. This means that it will not necessarily provide a true reflection of traffic movement within Guildford. A different model should be used and the peak times adjusted to accurately reflect traffic, particularly within rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2488  Respondent: 15501313 / Matthew Dougherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2489  Respondent: 15501377 / Elmbridge Borough Council (Karen Randolph)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt & Countryside Study

As part of the Draft Local Plan consultation the Council expressed concern regarding the transparency of the study and the subsequent methodology and assumptions for the appraisal of sites. Following the inspection of the Draft Local Plan; Topic Paper: Green Belt and the Countryside; and the Volume II Addendum, the Council welcomes the reconsideration of Green Belt as a constraint and the weight applied to the strength of each individual Green Belt parcel and how this has influenced the assessment of Potential Development Areas. The Council considers therefore that its concern regarding the process of applying the weight of the Green Belt parcels to have been addressed.

Nevertheless, the Council remains concerned that the original study and subsequent updates made since the Draft Local Plan consultation, make no attempt to address the strategic significance of the Green Belt across the wider area and its fundamental aim in preventing the sprawl of London. We feel it is essential that any study seeks to address this issue and that Guildford Borough Council works with surrounding Housing Market Areas (HMAs) in doing so. If we have missed this consideration amongst the evidence base documentation, we would be grateful if this is signposted.

In addition, we note a number of instances where development sites adjoin or are close to borough boundaries e.g. Land at Former Wisley Airfield. We are sure that it is appreciated that it will be important to work with the relevant boroughs I districts as the Local Plan continues forwards on these issues, and in their stages of delivery I implementation. This will be particularly relevant where urban areas already coalesce.
Exceptional Circumstances Case

As recognised in the Topic Paper: Housing Delivery, exceptional circumstances are required to justify any amendment to the Green Belt boundary in accordance with the National Planning Policy Framework (NPPF), para. 83. We acknowledge the factors set out in para. 4.17 of the Topic Paper which Guildford Borough Council considers in general terms are exceptional. We do not wish to dispute that these are challenges for Guildford Borough Council. However, we have some concern that the issues identified are not particularly unique to Guildford Borough, e.g., affordability and unmet need, are common place within a South-East and Surrey context. Further consideration may therefore be required to ascertain whether the Guildford Borough Council considers that this is an 'exceptional' case to amend the Green Belt boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2492  Respondent: 15502113 / Paul Gaffikin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2493  Respondent: 15502177 / Steve Plewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2583  Respondent: 15502209 / Shirley Atkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
- The "objectively assessed need" figure of 693 homes a year is too high.
A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**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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The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2505   Respondent: 15502977 / Alexandra Morton   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2508   Respondent: 15503105 / Beml Evans   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Attached documents:

Comment ID: PSLPA16/2509   Respondent: 15503169 / A Palitchell   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2515  Respondent: 15503361 / James Pasfield  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2516  Respondent: 15503585 / B Powell  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Attached documents:

Comment ID: PSLPA16/2519  Respondent: 15503617 / Stephen Roy  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2521  Respondent: 15503649 / N Ord  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2542  Respondent: 15504001 / Margaret Banks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
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Attached documents:
Submitted on behalf of our client Kitewood Estates Ltd

2. Proposed Housing Strategy

- This section considers the requirement for a Local Planning Authority to identify, plan for and deliver a supply of new homes to meet an identified Housing Need

Requirement of the NPPF

- The NPPF was published in March 2012, long before work began on the Local Therefore, the evidence base which supports this Local Plan should be NPPF-compliant.

- One of the key aims of the NPPF is to boost significantly the supply of To achieve this aim, the NPPF places new responsibilities on local planning authorities to “use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in their housing market area” (Paragraph 47). This evidence base should be “adequate, up to date and relevant” (Paragraph 158). The NPPF also requires that the Plan should identify the scale and mix of housing which:
  - Meets household and population projections;
  - Addresses the need for all types of housing, including affordable housing; and
  - Caters for housing demand and the scale of housing supply to meet this

Requirement of the PPG

- The Planning Practice Guidance to accompany the NPPF was first published in March 2014 and is kept up-to-date on an on-going It provides further guidance on the steps that plan-makers should take when determining the objectively assessed housing need in their area.

- Paragraph 080 requires that housing “needs should be assessed in relation to the relevant functional area, e. housing market area”. This means that authorities should consider the need in those neighbouring authorities with which it has strong economic or migration links, in addition to its own need.
• Paragraph 015 goes on to set out that the household projections published by the Department for Communities and Local Government (DCLG) should provide the starting point for estimating the overall housing need.

• Paragraph 016 states that wherever possible, local needs assessment should be informed by the latest available data. The NPPF is clear that Local Plans should be kept up-to-date.

• Paragraph 018 requires that an adjustment to the starting point should be considered to ensure that sufficient housing is provided to meet the needs of the economy (by increasing the local labour supply). It states: “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area”.

• Paragraph 019 goes further, setting out that a further adjustment should be applied if there are market signals indicating an imbalance between the demand for and supply of housing: “prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand”. Relevant indicators include house prices, rents, affordability and

Compliance with NPPF and PPG

• The Proposed Submission Local Plan (July 2016) (Regulation 19 consultation) sets out that the council will make provision for **13,860 additional new homes** (Policy S2) over the plan period (2013-2033). This equates to an annual figure of 693 dwellings per annum. This is made up of an anticipated requirement of 517 dwellings, with an uplift of 25 homes for student growth, 120 homes for economic growth and 31 homes to address market signals and affordability (total 693).

• This figure of 693 dwellings per annum is taken from the West Surrey Strategic Housing Market Assessment (SHMA) – Guildford Summary Report (October 2015) prepared by GL Hearn (Section 4 - Objectively Assessed Need).

• The previous iteration of the Local Plan (draft version - July 2014) (Regulation 18) set out that provision would be made for **13,040 new homes** over the plan period (2011-31), equating to an annual requirement of 652 new homes. This updated figure, therefore, represents an increase of 820 homes over the plan period, compared to the previous (Regulation 18) version.

• This increased annual requirement is consistent with the Fully Objectively Assessed Need (FOAN) set out in the West Surrey SHMA October 2016.

• The PPG requires that the starting point for the calculation of OAN is the household projections published by the Department for Communities and Local Government (DCLG) when estimating the overall housing need (Paragraph 015). The 2015 SHMA applies household formation rates from the 2012-based household projections to the 2012-based ONS Sub-National Population Projections to provide an appropriate starting point for considering housing need.

• This is unsound, given that, since the publication of the mid-2012 population projections in 2013, mid-year population projections have been published for mid-2015, mid-2014 and mid-2013. As a minimum, the mid-2014 projections should have been used as the basis for the 2015 SHMA which was prepared in 2015 and published in October 2015, well after the mid-2014 projections were published.

• We consider that, on the basis of the above, the SHMA should be revised to take into account the latest 2014 mid-year projections in order to meet the requirements of the NPPF and the 2014-based projections show an increase of 39 households per annum over the 2012-based projects. Applying this increase logically to the overall OAN, the Council has a need to for 732 dwellings per annum and an overall plan target of 14,640.
Duty to Co-operate and the wider Housing Market Area (HMA)

- The 2015 SHMA identifies that Guildford shares a HMA with Woking Borough Council and Waverley Borough. Both authorities are also in the plan-making process and it has not been determined whether either Council will be able to meet their own OAN requirements as set out in the SHMA.

- The Plan should build the contingency of an early review if the plans of the neighbouring authorities are delayed or if they are unable to meet their In this scenario, there may be a requirement for GBC to provide for the unmet need of its neighbours in line with Paragraph 182 of the NPPF.

Five year supply

- In accordance with Paragraph 47 of the NPPF, the Council is required to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing.

- Housing need within the Borough was most recently assessed as part of the West Surrey Strategic Housing Market Assessment (SHMA), published in October. The report considers the need for housing within the West Surrey Housing Market Area, which includes Guildford, Waverley and Woking Boroughs. Overall, the SHMA identifies an Objectively Assessed Need (OAN) of 693 dwellings within the Borough of Guildford per annum.

- The council currently monitors this supply through its Annual Monitoring Report (AMR). The most recent version of the AMR, published in October 2015, concludes that there is a 4 year supply against the OAN of 693 homes per year. The council is, therefore, unable to demonstrate a five year supply of housing land.

- The Proposed Submission Local Plan: Sites and Strategy continues to base its housing trajectory on this. To take account of rising population levels, and to build greater flexibility into the plan, Policy S2 sets out a target of between 700-800 additional dwellings per annum.

Identified supply of housing

- In order to meet the requirements of Policy S2, the emerging Local Plan allocates a number of sites considered to be suitable for residential. These allocations provide land for approximately 10,778 new homes over the plan period across 34 identified sites. The remaining housing provision is made up of windfall sites, broad locations (such as Ash and Tongham) and commitments.

Deliverability

- The site allocations set out within the emerging Local Plan identify a number of large sites capable of accommodating over 1,000 new homes. Some of these larger sites are reliant on some significant infrastructure works which will need to be provided for before housing could be delivered. These include:

  - (A24) Slyfield Area Regeneration Project, Guildford;

Allocated for 1,000 new homes. Policy A24 states that delivery and timing will be dependent on the key infrastructure requirements as set out in the Infrastructure Delivery Plan.

  - (A25) Gosden Hill Farm, Merrow Lane, Guildford;
Allocated for 2,000 new homes. Implementation is reliant upon highway works to relocate the southbound on-slip of the A3, and a new roundabout to provide a link to the A3100.

- (A26) Blackwell Farm, Hogs Back, Guildford;

Allocated for 1,800 new homes. Implementation reliant upon the realignment of a junction on the A31 and the Down Place road, which will need to be signalised. Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue. A through vehicular link is required via this access between Farnham Road (A31) and Egerton Road to provide a new route to Surrey Research Park. Other highways impacts may need to be mitigated against.

- (A35) Land at Former Wisely Airfield, Ockham;

Allocated for 2,000 new homes. Interventions will be required which address the possible highway performance issues including a number of mitigation schemes to address issues, particularly on the A3/M25 junction Wisley interchange.

Summary

- Overall, the plan has been positively prepared in an attempt to fully meet the Council’s identified Objectively Assessed
- Unfortunately, the evidence base behind the OAN is out of date and will need to be updated ahead of the submission of the Plan to the Secretary of State. This is likely to result in an uplift to the overall housing target which reinforces the need for the Flexford/Normandy strategic allocation. This allocation would also have the capacity to provide additional residential accommodation if the Council is required to find more housing land to meet an increased target.
- Whilst we do not contest the deliverability or soundness of any of the proposed allocations within the Plan, we do note that many of the larger allocation are reliant upon the delivery of significant highway infrastructure before any dwellings will be This further supports the allocation of the Normandy/Flexford site which has relatively few constraints to the deliverability of much needed housing and social infrastructure.
- The merits of the Normandy/Flexford site are discussed in more detail within the following

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2578  **Respondent:** 15504929 / William Scott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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I trust that the objections made above are 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:

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Comment ID: PSLPA16/2574  Respondent: 15504993 / Harry Eke  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to 2016 Local Plan

I OBJECT to the Guildford draft plan and its impact on the villages of Send and Ripley in particular plans A25, A35, A42, A43, A43a and A44.

- I OBJECT to the proposal to build 4,485 new homes as planned in the policies listed above. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) include an inflated number of foreign students and an unsubstantiated demand for new homes within the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2585  Respondent: 15505313 / Samantha J S Perry  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, that is more than double the figure of 322 used in previous plans.

This figure cannot be verified because the Council will not publish the SHMA report. This lack of transparency is deplorable for a realistic consultation of the Plan to be conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2586  Respondent: 15505377 / Simon Wright  Agent:
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2587</th>
<th>Respondent: 15505409 / Ian Cunningham</th>
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<th>Comment ID: PSLPA16/2589</th>
<th>Respondent: 15505601 / Emma Robson</th>
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Comment ID: PSLPA16/2643  Respondent: 15506081 / Dale Miller  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Comment ID: PSLPA16/2641  Respondent: 15506113 / Sheila Taylor  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Comment ID: PSLPA16/2599  Respondent: 15506177 / Jean Calas-Hathaway  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPA16/2639  Respondent: 15506209 / Rosemary Richardson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2638  Respondent: 15506305 / Pamela Sadler  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2636  Respondent: 15506401 / Alicia Robinson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2635  Respondent: 15506433 / Geoffrey Robinson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2603  Respondent: 15506465 / Lisa Garner  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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<th>Comment ID: PSLPA16/2602</th>
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I object to the figure of 693 houses per annum in the borough because this is too high (Appendix D) The Plan’s proposed growth is based on the SHMA report which uses a figure that is almost double. It says 693 homes a year are required by the borough but previous plans say 322. The report will not be published so this cannot be verified, which is not acceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/2618</th>
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Attached documents:
Comment ID: PSLPA16/2614  Respondent: 15506785 / Maverick Hornblow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I objects to
lack of evidence for housing numbers needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2615  Respondent: 15506817 / Reno Hornblow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2619  Respondent: 15506881 / Chloe Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPA16/2620  Respondent: 15506913 / Nicholas Mann  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/2647  Respondent: 15507617 / Ewan Collens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Comment ID: PSLPA16/2659  Respondent: 15507713 / Yvonne Connolly  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2660  Respondent: 15507745 / M Grainger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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: PSLPA16/2661  Respondent: 15507809 / M Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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Comment ID: PSLPA16/2653  Respondent: 15508385 / Susan Woodman  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I can find no evidence for the alleged housing need numbers of 693 a year which is more than double the previous figure of 322 in 2012. Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

Brownfield opportunities are being ignored. We need homes in the centre, more accommodation on campus for students, and homes for the elderly would free up family houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2654  Respondent: 15508961 / Abby Allen  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have concerns over the validity of the data concerning the required number of new houses in the Borough of Guildford. The SHMA is apparently based on a mathematical model which has not been independently verified. GBC have then randomly increased this number resulting in a population increase which is 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?

Attached documents:

Comment ID: PSLPA16/2695  Respondent: 15569377 / Catherine Hunter  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3780  Respondent: 15569377 / Catherine Hunter  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2717  Respondent: 15570273 / Barnaby Geib  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2718  Respondent: 15570305 / Richard Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3648  Respondent: 15570817 / Tom Edelsten  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
flaws in the method for estimating the number of homes needed to support job growth.

• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GEF also highlight that there is no objectively assessed need for housing yet established, since the figure used is based on a Strategic Housing Market Assessment that is not transparent in its methodology. Whilst the document has been produced externally to the Council, apparently by established practitioners in the field, and claims to have produced a measure of the “objectively assessed needs” the methodology used by them is (still) being claimed to be confidential. This is outrageous, and demonstrably undemocratic as it denies the public the means by which to assess the veracity of the conclusions therein.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The basis on which the council calculated the number of new homes across the whole borough that is required is highly questionable. They are massive mathematical doubts about the basis of the calculations, which in any case have not been released or discussed publicly. In addition the population increase forecasts used in the Plan are about 70% higher than the official national estimates for population growth. This would result in a 35% growth of existing West Horsley households, which is unsupported, not necessary, and totally inequitable.

We find it very frustrating that after two years consultation, meetings, discussions, that the Borough Council has basically made no changes to its original inaccurate assumptions, or amended the flawed areas of the original plan in any way whatsoever. Too much response seems to be driven by reacting to Building Developers’ planning approaches rather than creating an overall modern Borough plan that will meet the needs of the residents, and allow well-planned and well-justified growth in the most appropriate areas. Brownfield in Guildford should also certainly not be ignored because it is supposedly ‘more difficult and costly’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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The current SHMA inflates the proposed housing figure due to:
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.
Attached documents:

Comment ID: PSLPA16/2742  Respondent: 15571585 / Bradley Vaughan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing numbers:

Regarding housing numbers the Strategic Housing Market Assessment has given a housing need of 693 per year, this is far too high and is double the figure given just 4 years ago.

Guildford Borough Council have not given details of how the figures have been calculated, the report is therefore unaccountable so should not be used.

The SHMA is fundamentally flawed, historical errors have not been corrected, there are issues over student housing requirements and errors in the estimation of homes needed to support growth.

By contrast the independent report by Guildford Residents Association comes up with a much lower figure of 510.

All other boroughs have reduced the figure that their SHMA came up with, Guildford have taken the highest number. Why have Guildford not constrained the figure?

The proposed 14,000 homes is a massive increase on the current housing stock, this is overdevelopment and is unsustainable. No justification has been put forward for such a massive increase in one town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2746  Respondent: 15571617 / Bruce Garbutt  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the SHMA on the basis that the population figures on which the whole plan is based are flawed. I object therefore to the figures and their validity.

Any education in statistical analysis would always warn against the perils of using an analysis over a short time period being used to produce projections over a long This appears to be precisely what has been done for the basic population forecast for this plan. I object strongly therefore to the consequent lack of validity of the SHMA. On the limited data shown (see (c) below), using a longer term base with similar methodology would give a materially lower figure.

This inflated forecast suggests that a positive policy of encouraging growth in excess of long term trends is being used although this does not appear to be explicitly stated anywhere as an actual The principal problems for me as a resident of Guildford concern the general inadequacy of the local infrastructure to cope with what exists today. The A3 is regularly now at a standstill for no reason other than the general weight of traffic; doctor and hospital services are overloaded, public transport outside the central conurbation is generally non-existent or incapable of meeting the needs of the current...
population trying to live at the 21st century pace of life. I object strongly therefore to any suggestion (stated or implied) of an intentional “go-for- growth-in-population” policy.

This highlights a fundamental problem with the whole of the SHMA analysis – the source of some raw data is defined but many of the modelling assumptions and also the model structures are not stated. The Council has refused to supply these assumptions and structures, claiming that they are commercially Given that the organisation that conducted the SHMA has commercial links to housing developers (as their website states,”We act for many of the leading developers and are currently advising on schemes totalling over 3m sq ft. We have a team of over 100 people directly involved in the development sector.”), I object strongly that all such assumptions and model constructs are not clearly visible to the public so that we can be satisfied that no undue developmental influence has been exerted on the results.

- I object that the results of the SHMA have been used unchanged by any practical constraints being
- The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to
- This local plan has completely ignored these factors by using the raw SHMA figures for detailed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2811  Respondent: 15571617 / Bruce Garbutt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

SITES - POLICIES A1 TO A57-sites in the Green Belt

I object to each of the proposals to remove sites in this list from the Green Belt on the following grounds:

1. The identification and allocation of sites in this Plan is made without regard to Green Belt, infrastructure or other constraints. The Plan says that “allocating these sites does not grant Planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council has received about individual sites ever since the Issues and Options consultation in 2013. The Plan has hardly changed since the Council received 20,000 objections to its first draft Plan in 2014. The Inspector considering the Plan may conclude that the consultation has not been properly conducted.

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the BREXIT referendum decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.
1. The Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notably roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

1. Having properly applied constraints if there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the Plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2761  Respondent:  15571937 / S Bennell  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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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: PSLPA16/2764  Respondent:  15572225 / Rob White  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

By the way what are the assumptions for the figure for 13,860 additional homes by 2033. Also what will be the impact of Brexit on this figure?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2766  Respondent: 15572353 / Dianne Kashel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 because the figure of 13,860 new homes seems to have been arrived at in a very arbitrary manner. I can’t see the need for such a vast amount of homes because there has been no massive surge in unfilled job vacancies. If few new jobs have been created the people living in these new homes will have to travel out of area to their place of work thus placing increased pressure on our already creaking road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2773  Respondent: 15572641 / Susan Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are 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:
Comment ID: PSLPA16/2786  Respondent: 15573921 / Carolyne Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2801  Respondent: 15574337 / Jacqueline Redknap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/2819  Respondent: 15575009 / Tony Redknap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/2817  Respondent: 15575041 / Marie York  Agent:

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 any evidence for the alleged housing needs number.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2823  Respondent: 15575201 / Richard Newman  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the SHMA report stating that the need for housing is 693 houses per annum. This figure is too high and over double that of 322 used in previous plans. There is an important lack of transparency here because the Council is unwilling to publish the SHMA report and as a result this figure cannot be verified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2830  Respondent: 15575649 / India P Donnell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My other more general concern is the SHMA. One of my favourite subjects is maths and I know what can be done with numbers to make an argument, but also how models can be floored in design. It seems to me that this model calculation is a total black box, with little validity in assumptions so creates a number that is totally unreal. As such this basis for the Local Plan calculations is floored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the local plan on the following points:</td>
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<td><strong>1. The Housing number of 693 is far too high. The SHMA calculations on how this number was reached have not been provided (and we have been asking for two years). Nobody in the council has checked it (or that is what the council have told us). Resident cannot check the calculation as GBC have refused to provided it. We are taking the number on trust from a company called GLHearn who represent developers, and boast on their web site they solve developer problems.</strong></td>
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<td><strong>2. Constraints on the housing number NEED to be applied as allowed but have not been. Guildford is 89% Greenbelt, 44% Area of Outstanding Natural Beauty, yet our roads are gridlocked and that is TODAY. This plan will not fix that just make it worse that is 14000 houses at 2 cars per house... on our roads extra!</strong></td>
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<td>Before going into detail, I would like to preface my comments with some general observations about the whole process. It is widely recognised that the country’s economy is out of balance and that too much business activity and supporting population is concentrated in London and the South East. It seems perverse, then, to exacerbate the problem by creating excessive development in the South East, putting further pressure on the region.</td>
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<td>There are other factors and constraints that need to be considered, especially the impact of Brexit on population figures and infrastructure funding, and the possibility of a third Heathrow runway, which would result in an enormous increase in traffic in the area. In addition, the Royal Horticultural Society is planning a major re-development of its headquarters at Wisley which will result in more visitors and traffic, putting further pressure on the A3 and nearby intersections. An increase of 25-30,000+ in the local population would cause intolerable strain on the Royal Surrey County Hospital, itself already under pressure.</td>
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The borough of Guildford is not an ‘island’. Development within the borough has impacts on surrounding boroughs and areas in terms of traffic, housing demand, infrastructure and so on. The reverse also applies. The piecemeal approach of the Local Plan process means there is no strategic planning, covering a much wider area, including London.

Taking just one example, the A3 serves a number of boroughs throughout its length and any development planned along its route by other boroughs will have a major impact on Guildford borough. To this extent, the entire process is flawed.

**Housing assessment - I OBJECT**

The Housing Minister Brandon Lewis has been quoted as saying: ‘Picking housing numbers out of thin air and imposing them on local communities builds nothing but resentment’. It is a pity GBC failed to hear him.

The Local Plan is formulated on an SHMA which has been based on a methodology unknown and unscrutinised, even by the Council. It is complete folly, therefore, to produce a ‘plan’ on such a basis.

Moreover, it has been produced by an outside company which is part of a major property and development business, thereby negating its objectivity.

The figure of 693 homes per year is substantially higher than the 2014 assessment and more than double that of the 2003 plan. Further doubt about the accuracy of the figure arises because of the Council’s previous actions in relation to the South East Plan. GBC made a successful legal challenge against the then Government’s proposal for 422 homes per year but now vigorously promotes 693 homes per year. At the time of the legal challenge victory, a senior Councillor said: ‘Our successful challenge means that local concerns have now been heard and taken into account when planning the future of our borough. …It is reassuring that the South East Plan housing targets which many felt would have prejudiced the character of the borough no longer apply.’ Why is the Council not hearing the local concerns now and why is it not fearful of a massive change in the character of the borough with such a high SHMA?

Furthermore, the SHMA is increased by GBC to give a population increase almost 70% higher than official ONS estimates for population growth in the borough. This, for example, results in an increase of 35% in existing West Horsley households. At present, there are 2,808 homes in both East and West Horsley: if the Plan is accepted as it is, there will be AN EXTRA 5,000 homes within five miles, including 600 in the Horsleys. Overall, the Plan proposes more than 8,000 new homes in the Green Belt but only about 1,100 in the Guildford urban area.

It is generally recognised that there is a chronic shortage of social housing and of one or two bedroomed properties for sale or rent in the borough. Moreover, there is a need for homes, particularly bungalows, for elderly people wanting to downsize and stay in the area. There appears to be nothing in the Plan to address these issues, except the aspiration for 40% affordable homes in the larger developments. With the current level of house prices in the borough, it is doubtful that many would-be buyers would be able to afford an ‘affordable’ property or an ‘affordable’ rent. Also, developers are renowned for using their ‘get-out card’ to avoid building ‘affordable’ homes. There appears to be a serious mismatch between the housing need and where and how it could be met. Rather, the Plan simply gives a green light to developers to build all over the Green Belt and to plan for future ‘easy’ growth.

The unjustified and inflated housing figure will cause unacceptable pressure on local infrastructure and result in a complete change in the character of the borough. The Council appears to be ‘going for growth’ for growth’s sake, ignoring its own past views as well as those of current residents. Overall, its Plan would ‘urbanise’ the borough, extending the sprawl of London and its suburbs to Guildford and beyond.

To minimise the need for huge infrastructure developments, most housing growth should be accommodated within Guildford itself, leaving the borough’s villages to grow organically.

In its desire for ‘forced growth’, GBC has utterly failed to consider the constraints to development and the SHMA figure, such as the Green Belt and need for infrastructure, which if employed would result in a much more realistic and sustainable scale of development and one in keeping with the borough’s character.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPA16/2897  Respondent: 15579137 / Nicodemus Brian Rhyner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Comment ID: PSLPA16/2899  Respondent: 15579361 / Caroline May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.

° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base.
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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2902  Respondent: 15579489 / Ben Palmer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I trust that the objections made above are 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:

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Comment ID: PSLPA16/2903  Respondent: 15579585 / Jorn Peters  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The borough’s aim to meet its housing need as set out in the West Surrey Strategic Housing Market Assessment (SHMA) is welcomed. As this is an important policy principle the borough may wish to consider whether meeting need should be set out more explicitly in the Plan in the context of both the annual need and the planned provision figures. Consideration of long term migration patterns alongside the shorter term 2012-based Subnational Population Projections (SNPP) in the SHMA is welcomed - strategically, both can usefully underpin household projections when assessing housing need. From a strategic transport perspective, Crossrail 2 would release capacity on rail corridors that are used by trains to/from Guildford and thereby help to support future development within the borough, although Crossrail 2 would not directly...
serve any stations within Guildford. Explicit support for Crossrail 2 and a recognition of its important contribution to delivering future growth as set out in the Local Plan would be welcomed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2907   Respondent: 15579649 / Peter E May   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

18. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
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   ° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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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: PSLPA16/2913   Respondent: 15580065 / Deniz Kucukreisoglu   Agent:  

It is extremely troubling and scandalous that no information on how the numbers development proposals, of properties were derived or calculated. It is not acceptable that the public or members of the council can be kept in the dark about all of the details of the Strategic Housing Market Assessment (SHMA). It is unacceptable that a property development consultant’s mathematical model, its parameters, and input values are not made public knowledge despite the fact that it is us who is most impacted by those ‘calculations’. Given that the details have not been revealed or communicated to us as far as I know, it is not unreasonable by residents of the local community, to consider the possibility of vested commercial interests and/or conflicts of interest not to reveal all details of the model and associated data. As if that was not enough, I understand that the SHMA numbers are to be further increased by Guildford Borough Council. It will surely result in even more unsustainable damage to our community, wellbeing and wildlife habitats as well as the greater tragedy of further destroying our precious greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D):

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
One final thought: in the wake of the 'Brexit' decision, surely the Local Plan will have to be revised or indeed rewritten because projected immigration/emigration and therefore population levels will change, requiring new estimated housing needs. We trust that this important question will be taken into account before any further decisions are made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2962  Respondent: 15582593 / Dermot McMullan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/2976  Respondent: 15583169 / Poul Jensen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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:** PSLPA16/2983  **Respondent:** 15583361 / Pat Moxon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2987  **Respondent:** 15583521 / Richard Moxon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/2932  Respondent: 15583585 / Josephine Rooke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2997  Respondent: 15583585 / Josephine Rooke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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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Comment ID: PSLPA16/2996  Respondent: 15583617 / Deborah Gillam  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<td>I object to the 2016 draft local plan on the following grounds -the lack of any evidence for the alleged housing need numbers.</td>
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Where is the evidence of the SHMA which is NOT revealed in the plan, nor, apparently to Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3024  Respondent: 15584161 / Alexandra Elson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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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: PSLPA16/3029  Respondent: 15584481 / Jeremy Hamilton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3713  Respondent: 15584641 / Miriam Gilkerson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any evidence for the alleged housing need numbers in this specific locale

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3044  Respondent: 15584833 / Maria Fort  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/3047  Respondent: 15584961 / Helen Meredith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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18. APPENDIXD
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough which I believe is excessive (Appendix D)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3081 Respondent: 15585601 / Sophie Corstin Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific
balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3083  Respondent: 15585601 / Sophie Corstin  Agent:

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1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3085  Respondent: 15585665 / Sophie Thompson  Agent:

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GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
No exceptional circumstances to allow Unnecessary Development have been shown by Borough Council to warrant the 2000 houses and traveller sites being built on Gosden Hill Farm.

Destroying Green Belt is wrong for many reasons stated by the GRA. The too high figures from SHMA must be reduced to Waverley and Woking councils reductions AT LEAST. Guildford's report on housing figures is UNSOUND.

As GBC did not properly account for how the reports figures were arrived at, and too short a period of consultation was given the Draft Local plan is unaccountable and therefore UNSOUND.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3114  Respondent: 15587073 / Mark Sweeting  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further. With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3122  Respondent: 15587105 / John Downes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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?
Sustainability Appraisal

This indicates that the Council’s preferred ONA option is Option 4 – ONA plus 14%. This cannot be justified. If the SHMA has been calculated correctly, and the ONA correctly extrapolated from it, there is no need to build in a buffer of over 1,600 homes in excess of SHMA (or, as in another place, 1,900). This is over-development to the equivalent almost of Blackwell Farm or Gosden Hill. Either of these projects could be cancelled or much reduced with no effect on meeting the SHMA.

Conclusion

There are huge difficulties in bringing forward a plan that will satisfy everyone. But the proposals (which I have just skimmed across above) are built on shaky foundations, are not explicit enough in detail and paint a picture of over-commercialisation of the Guildford environment.

One of the critical factors is whether an A3 tunnel would be built. Only once decided can plans begin to come together of what the housing need will be, particularly in the Burpham area. If those plans continue to include Gosden Hill, no housing should be built until the tunnel has been finished.

If there is to be no tunnel, the immediate need would be for a four-way road interchange just north of Potters Lane. A two way in Burpham spells disaster for Burpham and Jacobs Well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/3140  Respondent: 15587361 / Aileen Creegan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/3153  Respondent: 15587649 / James Masterman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. HOUSING NUMBERS

It is suggested that 693 houses per year need to be built, totalling 14000 over the next 20 years. How can residents be asked to believe such a figure when

- this is double the number calculated by GBC 4 years ago
- GBC refuse to share with their customers (ie borough residents), information on the key elements and inputs to the model used.

The figure produced represents a 25% increase in borough housing stock and thus population. Given the massive impact this will have on the borough, its calculation elements must be opened up for proper local scrutiny and debate. Additionally, following the recent BREXIT vote, some assumptions of a diminution in housing stock pressure over the 20 year time horizon should now be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3168  Respondent: 15588001 / Mary Jane Godfrey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.  

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| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | I am unconvinced that there is sufficient evidence to support the projected housing needs  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents: |

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<th>Comment ID: PSLPA16/3212</th>
<th>Respondent: 15588929 / Alex Hutchings</th>
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- failure to correct for errors in the historical data for international migration flows,
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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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Attached documents:

Comment ID: PSLPA16/3230  Respondent: 15589665 / Anna Worsley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/3236  Respondent: 15589889 / Keith Macdonald  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/3250  Respondent: 15590241 / Claire Tallis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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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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 UNSUSTAINABLE, based on FLAWED DATA draft Local plan june 2016

As GBC did not properly account for how the reports figures were arrived at, and too short a period of consultation was given the Draft Local plan is unaccountable and therefore UNSOUND

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3287  Respondent: 15590593 / Johnathan Page  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/3290  Respondent: 15590881 / David Godden  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

HOUSING - Construction on the Green Belt may not be necessary at all now that housing needs have fallen because of Britain’s imminent departure from the EU.

The council has estimated incorrectly based on flawed data- the SHMA figure has doubled from 4 years ago, and it is wrong on several counts, it fails to correct historical errors, it fails to account for immigration from EU falling to zero after the BREXIT, it is flawed in the way student needs are considered and estimations in job growth post Brexit.
Waverley and Woking Borough Councils are sensibly applying reductions to the proposed levels of housing growth, and so must Guildford Borough Council, before the earmarking of Green Belt countryside for development.

RETAIL - Retail Space is planned at 40% growth, clearly going against trends in retailing and internet shopping and Post Brexit economy influences. This is clearly unsound planning. The need for less traffic in the already congested town centre should be given priority over more development. There will be less need for the proposed 1000 car park and ride, not more. Any needed development should be done on BROWNFIELD sites that will no doubt appear in town as the retail sector reduces, not on pristine country rural 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: PSLPA16/3298   Respondent: 15591169 / Ollie Deatker   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation.

My comments are set out in this letter. I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not accept the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period. I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I fully and un-equivocally support this policy. The Green Belt is a national asset which should be treasured; the whole character of Surrey will change over time if GBC allow the degradation of the Green Belt. If every time there is pressure to build housing, GBC uses the Green Belt as an area for negotiation, the unique character of Surrey will be lost forever and the generations that follow will look at this moment as a trigger point in the decline of Surrey.

Unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt. I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is here currently, let alone the proposed developments in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPA16/3297   Respondent: 15591201 / Matthew Deatker   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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<th><strong>Respondent:</strong> 15593761 / Celestyn Kwapisiewicz  <strong>Agent:</strong></th>
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<th><strong>Respondent:</strong> 15594817 / Toni Thompson  <strong>Agent:</strong></th>
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<td>PSLPA16/3353</td>
<td>15594945 / Sally Thomas</td>
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<td>15595137 / Sheila Keogh</td>
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Comment ID: PSLPA16/3349  Respondent: 15594849 / Andrew Thomas  Agent:

- I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3353  Respondent: 15594945 / Sally Thomas  Agent:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3361  Respondent: 15595137 / Sheila Keogh  Agent:

- We 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 is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the SHMA figure. Appendix d: evidence base

The SHMA proposed housing numbers of 693 houses per in annum is very high and bears no resemblance to the national estimates for housing growth. There is no explanation of these numbers and they seem very doubtful and appear to be grossly overestimated. The number is more than double the figure of 322 which has been used previously and as the source is confidential there is no tracking and this should not be used in consultation, it is undemocratic.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3390  Respondent: 15596065 / Maryjane French  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Where are the calculations for the required number of houses coming from. There is no evidence and the latest I heard was that the number could be reduced due to Brexit plans!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3394  Respondent: 15596225 / Thomas Patrick O'Shaughnessy  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I consider the Council's proposals to be seriously detrimental to Guildford and the surrounding areas, particularly Burpham, Merrow, Send and Ripley, and believe the research and presentation of data to be deeply flawed and inaccurate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3401  Respondent: 15596513 / Christine Matthews  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Appendix D
2. I object to the lack of evidence and justification for the housing need numbers.
These cannot be based on any sensible analysis of local demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3400  Respondent: 15596545 / Nye Morgan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I accept the need for additional housing, particularly low-cost housing, for future generations but I do not accept the figure of 693 houses per year and do not understand why there is no background information available to explain how this figure is calculated. I object to this figure being used as the basis for decisions which will alter the local landscape for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3402  Respondent: 15596609 / Della Morgan  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I accept the need for additional housing, particularly low-cost housing, for future generations but I do not accept the figure of 693 houses per year and do not understand why there is no background information available to explain how this figure is calculated. I object to this figure being used as the basis for decisions which will alter the local landscape for ever!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3422  Respondent: 15598721 / Trevor Ottaway  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.
I Object to the figure of 693 houses per annum in the borough being too high - (Appendix D)

The Plan's proposed growth is based on the SHMA report which says that 693 homes per year are required by the borough, which is more than double the figure of 322 used in previous plans.

However, as the council with not publish the SHMA report, this figure cannot be independently verified. This lack of transparency is farcical and disables fair consultation.

The housing numbers projected by the Council have not been substantiated by the Council, in spite of many requests, so the West Horsley Parish have carried out their own survey, that clearly suggests the figures to be wrong. The Green Belt must be retained as it stands today and each Planning Proposal should be judged on its own merits. I voted Conservative when they came to office and they vowed to preserve the Green Belt, therefore I expect them to stand by that promise.

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual
sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3435  **Respondent:** 15601057 / Chris Vinall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
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  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base.
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The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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Attached documents:

Comment ID: PSLPA16/3437  Respondent: 15601121 / Elspeth Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/3439  Respondent: 15601185 / Jane Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

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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:** PSLPA16/3441  **Respondent:** 15601249 / Ann Barrass  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**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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I OBJECT TO the lack of any evidence for the alleged housing need numbers. Numbers based on growth and demographic data now invalidated by Brexit. • No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure. • 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account. No reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units. • High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3470  Respondent: 15602561 / Jonathan Clark  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3975  Respondent: 15603297 / Rony Douek  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the figure of 693 houses per annum in the borough being too high (Appendix D). We should not be overbuilding in an area which is already congested. GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation. In any case, the request is very worrying.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3489  Respondent: 15603489 / Simon Pitt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

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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: PSLPA16/3516  Respondent: 15604449 / Annabel Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as I as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as I as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I
believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  • failure to correct for errors in the historical data for international migration flows,
  • issues with the way it considers students and affordability and
  • flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.
Comment ID: PSLPA16/3536  Respondent: 15607425 / Louise Quy  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan's proposed growth is based on the SHMA report which says that 693 homes per year are required by the borough, which is more than double the figure of 322 used in previous plans.

However, as the council with not publish the SHMA report, this figure cannot be independently verified. This lack of transparency is farcical and disables fair consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3538  Respondent: 15607553 / Penelope Gillmore  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  

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 the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The "objectively assessed need" figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is inappropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3540  Respondent: 15607681 / Robin Hopwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3550  Respondent: 15608225 / Louise Wickham  Agent:
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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 the figure of 693 houses per annum in the borough being too high (Appendix D)**

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

**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 Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)**

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to:
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough, since this figure is too high and not supportable (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3561 Respondent: 15608801 / Beth Fuller Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/3566  Respondent: 15609057 / Julian Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the evidence - GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed, as numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required number of 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, 8,000 new home homes are actually needed (based on 2.5 persons per home). The Green Belt does not need to be built over. 50% of the new homes could be built on brownfield sites. GBC’s Transport Assessment was not even available to councillors for the vote taken on May 24th, having been published on 6th June. The overload to the infrastructure has been given scant consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3600  Respondent: 15610081 / Sarah Kelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

1. NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with – 50 000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.
1. BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

1. DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3601  Respondent: 15610113 / Paul Mullarkey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan includes some targets for housing need, which are exaggerated because of some flawed assumptions - as demonstrated by other experts (GRA Report). Also Guildford is not choosing to constrain its overall growth as other places in Surrey are doing legitimately and thereby coming out with lower needs. I would urge Guildford to adopt the practice of other boroughs in the county, particularly given the constrained geography of Guildford as a gap town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3610  Respondent: 15610433 / Clare Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3612  Respondent: 15610465 / Tess Corlett  Agent:
** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, which is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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Attached documents:

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Comment ID: PSLPA16/3627  Respondent: 15611201 / Jed Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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: PSLPA16/3644  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
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1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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Attached documents:
The Government's Strategic Housing Market Assessment (SMHA) for proposed new housing in the area has been exceeded by some 70%.

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No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.

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<th>Respondent: 15615233 / Gareth Nassh</th>
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Comment ID: PSLPA16/4073  Respondent: 15615297 / Carole Butcher  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.

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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: PSLPA16/3668  Respondent: 15615745 / Nicholas Thompson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that the Council was required to give proper consideration to constraints. I also believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

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   - The “objectively assessed need” figure of 693 homes a year is too high.
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It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

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Attached documents:

Comment ID: PSLPA16/3689  Respondent: 15616929 / Nigel Wickham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

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Attached documents:

Comment ID: PSLPA16/3697  Respondent: 15617185 / Michelle Mitchell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPA16/3703  Respondent: 15618305 / Lawrence Claridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPA16/3707  Respondent: 15618561 / Howard Klein  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, there are remaining about the future housing requirement figures, with a risk that entire Guildford Plan is based on exaggerated forecasts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3709  Respondent: 15618689 / Julia Ray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I cannot verify this number to be correct. Transparency should be provided because it appears that the number has doubled from previous years and this cannot be correct.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/3727  Respondent: 15618977 / Chris Marles  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Does the evidence for housing need still stand up with the Brexit vote?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPA16/3738  Respondent: 15624577 / Alec Marshall  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3755</th>
<th>Respondent: 15626561 / Aecom (Phillip Scott)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>

On behalf of our client, Tyrrell Place Limited, please accept and register these formal representations to the Borough Council’s Proposed Submission Local Plan (Regulation 19) in relation to the Proposed Submission Borough wide Strategy and additionally to the omission of the Tyrrell Site, Long Reach Ockham from the list of sites proposed for future housing development.

These representations confirm our objection to the following Proposed Submission policies:

• Omission site: Former Tyrrell F1 Site, Long Reach, GU23 6PG (LAA site no. 1502). The failure to allocate this brownfield former industrial site for housing development.
• Proposed Submission Policy S2: Borough Wide Strategy. The absence of a clear linkage between sustainable patterns of development and the re-use of brownfield land in the Green Belt in advance of greenfield sites.
• Proposed Submission Policy P2: Green Belt. The absence of a clear local policy approach regarding the re-use of brownfield sites in the Green Belt.

Background
Tyrell Place Limited objects to the Borough Council’s Submission Local Plan in relation to the omission of the Tyrrell Site, Long Reach, Ockham (‘the omission site’) from the schedule of Proposed Submission Housing Sites. We are particularly concerned that this brownfield site is not being actively promoted given the very favourable assessment of housing potential in the Council’s Land Availability Assessment (‘LAA’) February 2016 which forms a key component of the evidence base underpinning the Proposed Submission Local Plan.

The omission site comprises 5.7 hectares of land, much of which is established and permitted brownfield, within the current extent of the Green Belt. A significant proportion of the omission site is previously developed (brownfield) industrial land formerly occupied by Tyrrell F1 (the principal buildings are now occupied by a wedding accessory supplier).

The omission site is also subject to an implemented industrial and commercial development which could deliver a very significant amount of additional development footprint on the brownfield site of approximately 2,782 square metres of industrial space. Furthermore, a large expanse of the site is covered in tarmac hard-standing whilst there is also an established dwelling within the omission site. The site also accommodates the original Tyrrell F1 shed where the first Tyrrell Formula 1 cars were designed, manufactured and serviced.

The southern section of the omission site is undeveloped and characterised by grass and other vegetation. The northern, eastern and southern boundaries of the site are lined by existing trees. The woodland serves to visually screen the omission site from the surrounding countryside and from the principal through-road known as ‘Long Reach’.

Long Reach has dispersed development along its length including existing houses, playing fields, and a plant nursery. The village of Ockham is less than a kilometre to the north-east of the omission site and it is notable that Long Reach becomes steadily narrower and winds its way toward the B2039 and then on to the strategic highway network. The rural roads in this part of the borough are wholly unsuitable to accommodate modern heavy goods vehicles (HGVs) and service vehicles associated with the current and implemented industrial use.

In that respect, a new industrial occupier could intensify the industrial use of the omission site significantly and would not require planning permission to do so given the implemented planning permission and the large area of hardstanding that is already established on the site.

The omission site has no particular heritage, ecological or landscape importance attached to it. Furthermore, the omission site is not within a Conservation Area and there are no listed buildings on the site. The omission site is not located within the Area of Outstanding Natural Beauty (AONB) or within the Area of Great Landscape Value. Finally, there is SANG available locally to help fully mitigate the impact of new housing on the Thames Basin Heaths SPA.

The nearest railway station to the site is at East Horsley approximately 1km to the south east, where there is also a range of local shops and services.

The Potential for Redevelopment to assist the Housing Land Supply

Various discussions have taken place over the past 3 years with Council officers. The advice received on separate occasions from officers is an acknowledgement, in principle, that an element of redevelopment for housing is acceptable in place of the existing and potential industrial development. This view is unambiguously supported by the Borough Council’s LAA February 2016.

We acknowledge that there has been disagreement between various parties and Council officers in relation to the quantum of new housing that Council officers would be willing to support on the omission site. Nevertheless, this brownfield site could make a valuable contribution towards delivering new homes, subject to detailed design considerations which could be delivered as part of a planning brief. This is also a view clearly shared by the Council’s LAA.

Delivering Brownfield First

The Foreword contained in the Proposed Submission Local Plan and produced by Leader of the Borough Council, together with the Spatial Vision (contained in section 3), both emphasise a clear preference towards delivering new...
housing development on brownfield sites in advance of developing greenfield sites. Yet despite those unambiguous statements and the vision, the reality is that:

1. The Borough Council is not promoting the established brownfield industrial land on the former Tyrrell F1 site for housing development.
2. The Borough Council is failing to meet housing need in the borough and has consistently under-performed in terms of housing delivery; and
3. The Proposed Submission Local Plan is promoting major greenfield, and strategic green belt land release to meet acute housing need, in direct conflict with its own stated objectives and vision regarding its ‘brownfield first’ development strategy.

Related Matters

A range of baseline studies have been undertaken to assess the likely impacts of delivering housing development on the eastern part of the omission site. Those studies include amongst others; a transport assessment, planning assessment, flood risk and surface water run-off assessment, land contamination study, and ecological (stage 1) assessments. All the studies carried out demonstrate that housing development can be delivered towards the eastern part of the omission site without causing any significant harm to amenities or the local environment.

Indeed the provision of new housing on the omission site will benefit local services and amenities by delivering a mix of housing for families and local people. Moreover, a modest amount of housing development would be far less visually prominent or harmful that an intensification of industrial use in this rural locality should the implemented (but as yet uncompleted) industrial premises be delivered by a new commercial occupier.

Housing Need and Land Availability Assessment

We note from the evidence base supporting the Proposed Submission Local Plan that housing delivery in the borough has not kept pace with identified housing need. Furthermore, the Borough Council cannot currently demonstrate a 5 year supply of deliverable housing land.

It is also highly notable that the Borough Council’s Land Availability Assessment (LAA) published in February 2016 specifically identifies the former Tyrrell Site (site no. 1502) as being a ‘realistic candidate for development’. Indeed, the LAA cannot be any clearer in terms of the credibility of the omission site when it states that, ‘Provision of new homes here would help towards meeting the housing number in the Local Plan and contribute towards achieving sustainable, inclusive and mixed communities’ Additionally, the LAA is equally supportive in terms of the environmental credentials that new housing on this brownfield site would have on the local environs, it states, ‘There is no known reason why well designed new homes in this location, that take account of the amenities of the neighbouring properties, should have an unacceptable impact.’ The LAA concludes by stating that, ‘This site is most suited for residential development, to provide new homes to help meet the identified need.’

The only aspect of the LAA which we do not agree with is the very low density of housing potential (8 units at 2 dwelling per hectare) particularly in the context of the amount of approved and existing industrial floorspace on the site including existing residential development.

In this context we are mindful that the Borough Council needs to facilitate a significant step change in housing land supply and housing delivery in order to meet local housing need. Brownfield sites such as the omission site, which has received such a favourable assessment in the LAA, can help play their part towards meeting housing land supply, and in line with the vision contained in the Proposed Submission Local Plan, brownfield land should be considered in advance of promoting greenfield land.

It is also highly notable that the omission site is outside of the AONB and beyond the Area of Great Landscape Value and it can, with appropriate design and sensitive planning, play its part in helping to meet the borough’s acute housing need, in advance of releasing major greenfield sites.
The redevelopment of the omission site for housing would also secure a more appropriate use of the site than intensified industrial uses in a rural location where increased HGVs and service vehicles would cause detriment to the environment and to nearby residential amenities.

Conclusion

Discussions have taken place over the past 2 years between various parties and Council officers which have consistently demonstrated that officers accept that some residential development on the former Tyrrell F1 site is acceptable, in principle, in place of the built and permitted industrial development.

The Council’s most recent Land Availability Assessment (LAA) February 2016 cannot be any clearer in terms of the credibility of the omission site when it states that, ‘Provision of new homes here would help towards meeting the housing number in the Local Plan and contribute towards achieving sustainable, inclusive and mixed communities’ Additionally, the LAA concludes by stating that, ‘This site is most suited for residential development, to provide new homes to help meet the identified need.’

The Proposed Submission Local Plan ‘Vision’ and the Foreword drafted by the Council Leader make it abundantly clear that the Proposed Submission Local Plan will promote a ‘brownfield first’ policy approach to housing land identification, and yet despite those stated objectives and the clear support provided in the LAA, this brownfield former industrial site has not been identified for housing development.

Moreover, the activated planning permission on the omission site means that industrial uses could be greatly intensified (together with associated HGVs and service vehicles) without the need for fresh planning permission. Such a scenario would not be in the best interests of the local amenities or the rural environs.

In light of all of the above, it is abundantly clear that the former Tyrrell F1 site at Long Reach is capable of accommodating a modest number of family to help meet the acute and rising demand for new housing, and in so doing ensuring that a future industrial occupier does not intensify the established use and generate a greater numbers of HGVs in this quiet rural location. It is highly notable that the intensification of the omission site for industrial purposes can occur without the need for further planning permission.

We are therefore seeking the identification of the former Tyrrell Site, as identified and supported in the LAA (February 2016) for housing purposes. The precise quantum and amount of housing development to be subject to the preparation of site brief.

I would be very grateful if you would confirm that these representations objecting to the omission of a brownfield former industrial site for housing development in the Proposed Submission Local Plan, have been registered and are ‘duly made’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [111111.png](111111.png) (597 KB)
[111122.png](111122.png) (96 KB)
Guildford Borough Council have not given details of how the figures have been calculated, the report is therefore unaccountable so should not be used.

The SHMA is fundamentally flawed, historical errors have not been corrected, there are issues over student housing requirements and errors in the estimation of homes needed to support growth.

By contrast the independent report by Guildford Residents Association comes up with a much lower figure of 510.

All other boroughs have reduced the figure that their SHMA came up with, Guildford have taken the highest number. Why have Guildford not constrained the figure?

The proposed 14,000 homes is a massive increase on the current housing stock, this is overdevelopment and is unsustainable. No justification has been put forward for such a massive increase in one town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3769  Respondent: 15627329 / Loraine Crates  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 evidence for the suggested housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3770  Respondent: 15627393 / Brandon White  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3779  Respondent: 15627809 / Fazia Cater  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

"
I'm writing to object about the local plan to expand Guildford by a quarter.

The proposal for expansion appears to be based on questionable and exaggerated evidence (see GRA report on housing). Why can't there be more student accommodation on campus?

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: PSLPA16/3788</th>
<th>Respondent: 15629025 / Surrey County Council (Sir or madam)</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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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Sites

**Key Evidence Page 122**

Strategic Transport Assessment should be included as one of the elements of Key Evidence used in determining the acceptability or otherwise of the Site Allocations.

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: PSLPA16/3793</th>
<th>Respondent: 15629633 / Wokingham Borough Council (Clare Thurston)</th>
<th>Agent:</th>
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<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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**Background**

Guildford Borough Council is consulting on their Proposed Submission Local Plan: Strategy and Sites from 6 June until 18 July 2016.

This is the first document with the purpose of setting the vision, aims and strategy for the Borough up to 2033. Following adoption of this, a second document will be produced on development management policies.

Wokingham Borough Council responded to Guildford Borough at the Draft Options consultation stage in September 2014. At that stage, a draft Strategic Housing Market Assessment (SHMA) was available indicating that Guildford Borough lies within the West Surrey housing market area. This only gave a draft indication of housing need (of between 650 and 780 dwellings per annum) for Guildford Borough. The main concern of Wokingham Borough Council previously has been whether Guildford Borough Council could release enough land (including potentially from the Green Belt) to meet its housing need.

**Analysis of Issues**

Since the Draft Options consultation stage, the final West Surrey Strategic Housing Market Assessment (SHMA) has been published (in October 2015). This indicates that Guildford Borough lies within the West Surrey housing market area with the boroughs of Woking and Waverley. The SHMA recognised there is a strong relationship between West Surrey
housing market area and that covering the Blackwater Valley (centred upon the authorities of Surrey Heath Borough, Rushmoor Borough and Hart District). Therefore, the Blackwater Valley housing market separates Wokingham Borough from the one which includes Guildford Borough. However, it is still important for Wokingham Borough Council to ascertain whether the West Surrey HMA is seeking to meet need within the HMA, as it may have implications for the Wokingham Housing Market Area if they do not.

The final objectively assessed housing need (OAN) for Guildford Borough is 619 dwellings per annum between 2013 and 2033, which gives an overall need of 12,380 dwellings over the 20 year period. (This considerable change between the draft and final housing need figures is due to the Government’s 2012 Household Projections being published during this time between.)

The plan seeks to allocate six strategic sites. This includes taking 1.6% of the Green Belt land in the Borough out of the Green Belt and allocating this for development. Overall the plan makes provision for 13,860 new homes, which will meet the housing need for the Borough.

Wokingham Borough Council is therefore satisfied that on the basis of available information that Guildford Borough Council are planning to meet the need for the Borough, but would welcome further understanding of discussions with Woking and Waverley Borough Councils regarding the meeting of the housing need as an HMA.

OUTCOME / BENEFITS TO THE COMMUNITY

That development proposed through the Guildford Borough Local Plan has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

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>PSLPA16/3797</th>
<th>Respondent:</th>
<th>15630849 / Denton Homes LTD</th>
<th>Agent:</th>
<th>Bell Cornwell LLP (Ian Sowerby)</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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We support the presumption in favour of development and the emphasis on positive planning that is embodied in Policy 51

We support the principle that the housing targets in Policy 52 and Table 1 will not be regarded as a ceiling. However, on that basis we object to the use of very precise targets in Table 1.

We are also concerned that there is an over-reliance upon large housing allocation sites in the planned delivery set out in Table 1.

We support the principle that the housing targets in Policy 52 and Table 1 will not be regarded as a ceiling. However, on that basis we object to the use of very precise targets in Table 1.

We are also concerned that there is an over-reliance upon large housing allocation sites in the planned delivery set out in Table 1.

We object to the 5-unit threshold which is contrary to the recent ministerial statement on affordable housing and the related sections in the NPPG. If the threshold is set at this low level it will actually stifle the supply of smaller residential sites by making them unviable, and will not actually deliver affordable housing.
Similarly, applying a 40% affordable housing quota to small sites will adversely affect their viability.

We recommend that the threshold should be set at 10 units, in line with the ministerial statement and NPPG.

We recommend that a sliding scale is adopted for all sites below 25 units.

We object to the identification of this site as a residential allocation.

The assessment at page 219 of the draft plan identifies it as an 'edge of village/semi-rural location'. We consider that there are more appropriate, less visually prominent, locations within the expanded settlement area of Send where new residential development can be satisfactorily accommodated under Policies 51 and 52.

To allow a full discussion of our client's objections and a consideration of alternative residential opportunities in Send.

We object to the identification of this site as a residential allocation.

The assessment at page 225 of the draft plan identifies it as an area which would need 'sensitive design at site boundaries that has significant regard to the transition from village to greenfield'. It is currently a valuable source of informal recreation on the edge of the village, with open views to the west and south.

We consider that there are more appropriate, less visually prominent, locations within the expanded settlement area of Send where new residential development can be satisfactorily accommodated under Policies 51 and 52.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3818  **Respondent:** 15631553 / Anthony Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( )**

1. I **object** that there has not been and **demand** that (a) there should be a significant challenge to the GBC scenario planning and (b) the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3830  **Respondent:** 15632161 / Anthony Dinkin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( )**

As residents of East Horsley we wish to lodge our strong objection to the draft plan. Our objection relates to those policies and proposals of the plan relating to: HOUSING and GREEN BELT and INFRASTRUCTURE.
We have seen the objections lodged by The Horsley Countryside Preservation Society, Horsley Parish Council, Guildford Green Belt Group, WAG and others. Insofar as they relate to these three main aspects of the draft plan we agree with them and support the contention that for the reasons they have advanced these aspects of the plan are fundamentally flawed and should be re-written.

However, it has been reported in Surrey Advertiser Friday 15 July 2016 that Guildford Borough Council (GBC) proposes to carry out a further review of the housing strategy following the UK decision to leave the European Union. Furthermore, objection has been made by others that GBC has failed to make full and proper disclosure of the basis on which the alleged housing need figures have been calculated. It is reported that GL Hearn who carried out the Strategic Housing Assessment have refused to disclose to GBC the assumptions and calculations underlying their conclusions. This is fundamental to the proper scrutiny of the soundness of the Housing and Green Belt proposals of the Draft Plan.

In these circumstances there has been a manifest failure by GBC to present a proper evidence base to support and justify the proposals of the Plan relating to the redrawing of the Green Belt Boundaries or to allow residents to properly scrutinise and understand the basis of the Plan. Without it GBC has itself failed to properly consider whether the proposals of the plan are soundly based. Without the information as to how the housing figures underlying the Housing and Green Belt Plan have been arrived at the legal requirements relating to the preparation of the Plan have not been properly followed and the validity of these related aspect of the Draft Plan, if not the whole Plan, is open to doubt and possible legal challenge in due course.

Paragraph 4.3.13 on the draft Plan contends that there are “exceptional circumstances …in order to facilitate the development that is needed to promote sustainable patterns of development.” Leaving aside site specific objections relating to the potential main development sites, in the circumstances referred to above there is no reliable evidence that the redrawing of Green Belt Boundaries is needed to facilitate sustainable patterns of development.

Given the prospect of a further review and decisions by GBC before the Plan is submitted to the Secretary of State we wish this letter to stand as our formal objection and representation on the draft Plan and to support the reasons lodged by the Parish Councils, the Horsley Preservation Society, Guildford Green Belt Group and WAG for objecting to it. We reserve the right to amend, expand or supplement this objection in detail in due course in the light of the Council’s up to date position before the Plan is submitted for Examination or thereafter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3831  **Respondent:** 15632289 / Claire Belton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 a whole, as the Borough has failed to provide proper evidence of the need for such a large amount of housing and for the appropriateness of most of the development.

I believe the Local Plan 2014 lacks valid research and evidence of need; lacks planning for infrastructure improvement already needed without further development of the area; and is being rushed through using the wrong Regulation (19). It must be properly reviewed and consulted fully under the correct Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3873  **Respondent:** 15636289 / Chris Holmes  **Agent:**
<table>
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<tr>
<th>Comment ID: PSLPA16/3876</th>
<th>Respondent: 15636481 / Peta Lawrence</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td>The annual housing target (13,860 additional homes by 2033) - how has this figure been determined? As a number with no substance behind it (how it has been derived) it is meaningless. I understand there have been several requests for the calculations to be made available with as yet nothing forthcoming from the Council. I am calling for transparency. It is my belief that 13,860 is excessive given the <em>current</em> population density. I have witnessed an increase in traffic congestion around the Guildford area over the last 10 years to the point now where it is having a negative impact on quality of life. Related to the above - the recent political changes will undoubtedly have an impact of net migration (immigration and emigration). This factor will need to be addressed by the Plan. Or at least confirmation of what % of the &quot;estimated population&quot; is attributed to migration from the EU. It may also be the case that we see a net emigration as EU migrants transfer to another Country still within the EU.</td>
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<th>Respondent: 15637633 / Scott Kent</th>
<th>Agent:</th>
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<td>There is a lack of published evidence for the proposed housing numbers.</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>Respondent: 15639905 / Alison Azzopardi</th>
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<td>I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.</td>
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The evidence upon which all of these significant proposed developmental changes is based, seems to lack any correlation to the published housing requirements for the Borough. It seems to serve only as an attempt to alter the status of, and then usher in the destruction of, large areas of the green belt. I object to the proposals – as there are already identified brown field sites which would be ideal for development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPA16/3928  Respondent: 15640705 / M J Azzopardi  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The evidence upon which all of these significant proposed developmental changes is based, seems to lack any correlation to the published housing requirements for the Borough. It seems to serve only as an attempt to alter the status of, and then usher in the destruction of, large areas of the green belt. I object to the proposals – as there are already identified brown field sites which would be ideal for development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPA16/3934  Respondent: 15641281 / Paula Redmond  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report which concludes that 693 homes a year are required by the borough, it is more than double the previous figure of 322 used in previous plans. I believe the SHMA report methodology to be inaccurate; it inflates the needs of the borough by distorted student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take into account protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to the Guildford area. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPA16/3939  Respondent: 15641505 / Annabella Goldsmith  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have yet to see any evidence of the need for the proposed number of houses.

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: PSLPA16/3941</th>
<th>Respondent: 15641569 / Trevalyn Gregory</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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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I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3943</th>
<th>Respondent: 15642881 / Douglas Denham</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Housing

Your proposed housing numbers of 13, 860 are impossibly high. How do you calculate these numbers – particularly after Brexit. The figures seem ludicrous and as officers you should explain them which you seem incapable of doing. This is worse than the civil servants in Brussels. I therefore object to all policies based on your housing figures. Housing policy should be based on real housing NEED for borough residents restricted necessarily by the requirement to preserve the Green Belt boundary. I further object to a Plan which requires 70% of housing to be built on the Green Belt – build modern nice flats on brown field land instead please. Brownfield land is available in the town centre. I would direct you to the open letter and brownfield site assessment sent to GBC councillors by Guildford Green Belt Group. I call on you to develop policies which require the use of urban brownfield sites first, which I believe can cope with real housing and commercial need and I object to your policies which do not do this (Policies H1,H2). The need for shopping and commercial space is declining with internet shopping and Guildford town centre should be revitalised with town centre housing. (Objection to policy E7).

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: PSLPA16/3952</th>
<th>Respondent: 15644577 / John Cotton</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</tbody>
</table>
I OBJECT TO the lack of any evidence for the alleged housing need numbers. I have two sons, both of which have bought property as first time buyers in Burpham and then in Send and Ripley, it is never easy to buy property but it can be done. Many people would like to live in Surrey, that is why it is expensive, but we have chosen to live in Surrey for what it is now, not what it is planned to be.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3973  **Respondent:** 15645441 / Guy Willans  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I and my wife write to make points on the proposed Draft Guildford Local Plan.

The following are my thoughts, comments and objections to the Draft Guildford Local Plan:

1. The plan is based upon a supposition of a need for a 25% increase in housing by 2033 across Guildford Borough, which is not based on any fact, just assumptions which have been arrived at by questionable means.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3976  **Respondent:** 15645537 / Francis Garguilo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing number of 693 is far too high. The SHMA calculations on how this number was reached have not been provided (and we have been asking for two years). Nobody in the council has checked it (or that is what the council have told us). Resident cannot check the calculation as GBC have refused to provide it. We are taking the number on trust from a company called GLHearn who represent developers, and boast on their website they solve developer problems. Constraints on the housing number NEED to be applied as allowed but have not been. Guildford is 89% Greenbelt, 44% Area of Outstanding Natural Beauty, yet our roads are gridlocked and that is TODAY. This plan will not fix that just make it worse that is 14000 houses at 2 cars per house... on our roads extra!

The transport evidence is very weak and major transport issues are unresolved e.g. another river crossing in the town, a central bus depot.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/4009  **Respondent:** 15649345 / Matthew Sarti  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

The housing number of 693 is far too high. The SHMA calculations on how this number was reached have not been provided (and we have been asking for two years). Nobody in the council has checked it (or that is what the council have told us). Resident cannot check the calculation as GBC have refused to provide it. We are taking the number on trust from a company called GLHearn who represent developers, and boast on their website they solve developer problems. Constraints on the housing number NEED to be applied as allowed but have not been. Guildford is 89% Greenbelt, 44% Area of Outstanding Natural Beauty, yet our roads are gridlocked and that is TODAY. This plan will not fix that just make it worse that is 14000 houses at 2 cars per house... on our roads extra!

The transport evidence is very weak and major transport issues are unresolved e.g. another river crossing in the town, a central bus depot.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
In respect of the 2016 Local plan public consultation, Matthew Sarti make the following comments.

1. I OBJECT to the 2016 local plan in its current format. I do not believe that it is sound and is not yet fit for implementation.

a) The council relies on a strategic housing making assessment that is in question. The council have not scrutinised the figure provided and rely purely on the fact that other councils have used the consultant GL Hern to assess the housing need. The SHMA appears to be exaggerated against ONS data. Two independent reviews have identified similar faults, which suggest that the figure is too high and inaccurate. They also identify that the recent referendum result relating to Europe may have an impact on economic growth and consequently should be reviewed. The objectively assessed need (OAN) upon which the council housing figures are based on the SHMA, until this is properly reviewed the numbers are unacceptable.

b) The council have chosen not to impose any constraints in respect of the OAN.

1. The Council have rightly identified that the borough has 89% greenbelt but has chosen not to consider this as a constraint. Approximately 65% of new development within the borough is proposed within the greenbelt.

2. The council appropriately identifies that the enhancement of the A3 is essential to the scale of development possible within the local plan. Page 21 Strategy and sites states 'The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford'. Highways England have made no commitment to improve the A3 and yet the local plan still seeks to deliver the full housing target through the delivery of three of its four strategic sites sighted directly beside the A3. The transport survey also highlights that traffic will be impacted and congestion worsened irrespective of what improvement measures are put in place.

c) Several aspects have not been fully considered prior to its publication for consultation. One example is the recent proposal by the Raleigh school to move sites and build a larger school to meet the needs of the community. This is much needed but failing to include it within the local plan has prevented early and effective consultation on the sites with clear information on what they will include and the potential for provision of proper and essential infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to provide my comments on the Local Plan.

I support the Guildford Residents Association (GRA) response to the Local Plan and oppose Guildford expanding by a quarter.

Particular points are in my view:

- Flawed evidence is exaggerating the need for expansion, as shown clearly by the GRA report on housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
• It is a matter of choice by our Council that it is proposed that Guildford would expand on this scale. Some sensitive measured development probably would be supported but the scale of what is proposed in the Plan is far from that. Why have the Council not constrained the numbers?

• There seems to be a conflict of interest with the company which provided the details on which the Plan is based as they have connections with developers who have an interest in the flawed conclusions which are being drawn.

• It is not clear why the Councillors have made a political choice to open the floodgates to expand Guildford on the damaging scale proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to each of the proposals to remove sites in this list from the Green Belt on the following grounds:

1. The identification and allocation of sites in this Plan is made without regard to Green Belt, infrastructure or other constraints. The Plan says that “allocating these sites does not grant Planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council has received about individual sites ever since the Issues and Options consultation in 2013. The Plan has hardly changed since the Council received 20,000 objections to its first draft Plan in 2014. The Inspector considering the Plan may conclude that the consultation has not been properly conducted.

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the BREXIT referendum decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.
1. The Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this, the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notably roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First, I believe constraints should have been applied. Secondly, I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

1. Having properly applied constraints if there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the Plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead, the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4048  Respondent: 15652033 / James Scrace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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 any supporting evidence for the alleged housing demand numbers, which are used as justification for building on the precious Greenbelt sites, sites which make the borough the desirable place many love to live and work in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4052  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
• failure to correct for errors in the historical data for international migration flows,
• issues with the way it considers students and affordability and
• flaws in the method for estimating the number of homes needed to support job growth.

• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objections to Regulation 19 Draft Guildford Borough Council Local Plan 2016

I object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent. The current SHMA inflates the proposed housing figure due to the following factors:

• the failure to correct for errors in the historical data for international migration flows;
• the way it inflates the requirements of students; and
• the flaws in the method for estimating the number of homes needed to support job growth.

The Green Belt and Countryside Study does not look strategically at options for development in major settlements beyond. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Exceptional circumstances do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation. It is apparent that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points. Evidence on bus travel is compromised because no clear location for a bus interchange is proposed. No information has been provided on the demand for and capacity of rail services, and the main line to London is already extremely busy in peak periods.

Information about the town centre as regards traffic, buses and parking is lacking. The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Lødymeard, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included.

The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patters in relation to the threat of the internet and the study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.
Key parts of the evidence are missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. It would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. It would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to government policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.” Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4070  Respondent: 15657121 / Robert Wheeler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4078  Respondent: 15658465 / Michael Cuell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The absence of the presentation of robust evidence for the alleged housing numbers – this is either down to the fact that the Guilford Borough do not know what they are doing, or symptomatic of everyone with a financial interest in this getting their noses in the trough. Whatever, it is simply unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4083  Respondent: 15658497 / Philip Willians  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
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 failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4102  Respondent: 15661761 / Rob Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Target housing number.

The target housing number is unsubstantiated, is nearly 70% higher than current official national estimates for population growth in the Borough and should be reviewed in the light of the referendum result to leave the EU (with the stated intention of reducing immigration associated with EU membership).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
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• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the use of inferior, inadequate and subjective documents in the evidence base.

In particular I object to the LAA, which is inconsistent in the extreme and incomplete, citing for example land considered for schools which has not been considered for housing despite being brownfield, in excess of 50ha and close to the railway. [eg site at Newmarsh Farm East Horsley – clearly brownfield due to lack of enforcement]. It is also highly subjective and open to challenge.

I object to the Borough Infrastructure Delivery Plan, which is incomplete, lacking in detail, not properly costed eg £5-£10 million or even worse £100-£250 million and relies on funding that is not allocated by central government and is more of a wish list than anything else.

I object to the use of the Green Belt and Countryside Study in all its volumes and addenda. Why is it that some sites are excluded because they weren’t identified in the Green Belt and Countryside Study despite numerous volumes and addenda? Why is it that some sites may impact the TBHSPA when they are outside the 5km zone are excluded (nothing to do with the size of site) and some sites are inside and indeed outside the zone but included? (again not to do with the size of site). It just appears to be inconsistent and subjective – quite possibly a desk-based study which has not been verified or cross-checked. This is unacceptable.

I object to the fact that modern building techniques appear to have been ignored such that there is almost no housing proposed for the town centre “due to flood risk”. In many other parts of the country this risk has been completely mitigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4214  **Respondent:** 15673313 / Stephanie Wiera  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

3) 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.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4227  **Respondent:** 15674273 / Savills for Thames Water (Katherine Jones)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

<please find attached document 'Land north of Ash STW'>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

**Comment ID:** PSLPA16/4230  **Respondent:** 15674689 / Chris Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D) The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. There is a lack of transparency in the SHMA report and therefore the figure cannot be independently verified.

I object to the proposed 693 houses per annum as this report was made before the result of the EU referendum. The resulting reduction of European immigration to the South East of England will reduce housing demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/4245  **Respondent:** 15679137 / Turley (Hannah Bowler)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Introduction**

These representations have been prepared by Turley on behalf of Markfield Investments Ltd in relation to ‘Land at Dunmore Farm’, which is being promoted through the emerging Local Plan. Previous representations have been made to earlier stages of the Plan-making process regarding the site.

This response focusses on matters pursuant to the soundness of the draft Plan and those which are of particular relevance in the context of our Client’s interest. For the most part these responses relate to:

- Land at Dunmore Farm;
- Settlement Hierarchy;
- Housing Need considerations;
- Green Belt release; and
- Strategic Site allocations.

In addition, the representations set out the merits of our client’s site, land at Dunmore Farm, which could contribute to delivering the strategic objectives of the draft Local Plan, in addition to, or instead of, sites currently being proposed.

**Land at Dunmore Farm**

These representations should be read in the context of the opportunities for the site to be delivered as a comprehensive development in association with the former allocation at ‘land adjoining Fairlands’. The site itself has not been identified at any previous stage of the Local Plan process, although is located directly to the south of the former safeguarded allocation at Fairlands which was considered within the Regulation 18 Local Plan consulted on in July 2014.
Our client’s landholding ‘Land at Dunmore Farm’ comprises 31.69 hectares of land as submitted in previous representations to the Local Plan. The site currently comprises farmland and paddocks with a limited number of existing buildings in the south eastern corner around Dunmore Farm. The site wraps around the former safeguarded allocation to the south-west, south and south-east of Wood Street village. The field parcels themselves are relatively clear internally with trees and hedgerows indicating the majority of the boundaries.

Throughout the plan process to date, our client has supported the inclusion of the Fairlands allocation within the plan, although wishes to further emphasise the wider opportunities for the area if the site were to be considered alongside Fairlands for allocation within the Local Plan.

- A comprehensive development that would provide not only market but affordable housing to meet the needs of the Borough and any unmet requirements from Woking Borough;
- Deliver a comprehensive masterplan that could incorporate a defensible landscape buffer which would ensure the permanent separation of the villages of Fairlands and Wood Street village by creating new defined edges to the settlements. This would reinforce the findings of the Green Belt Study 2013;
- Direct new development in a sustainable location in line with the settlement hierarchy and enhancement local facilities and public services;
- Provide new development in locations where growth will be required to support the continued economic growth of Guildford as a town centre;
- The potential to incorporate appropriate Suitable Alternative Natural Greenspace to offset the proximity of the site to Thames Basin Heath SPA.

In light of the development potential of the site either as a small scale Green Belt release to the north of Wood Street village or in conjunction with any potential allocation at Fairlands, there are a number of key considerations that arise from the draft Local Plan as currently written that undermine the overarching strategy of the Plan. These are considered to be fundamental to the soundness of the Plan when considered against paragraph 185 of the National Planning Policy Framework (NPPF). The following are discussed in more detail below:

- Settlement Hierarchy
- Housing Needs; and
- Green Belt

**Settlement Hierarchy**

The Settlement Hierarchy Background Paper (May 2014) has informed the overarching strategy towards directing development within the draft Local Plan. The current Local Plan 2003 identifies both Fairlands and Wood Street village as settlements within the Borough and this designation has been re-assessed through the 2014 paper.

It is evident that Fairlands and Wood Street Village rank similarly with regard to the provision of services being ranked as 10 and 12 respectively of all settlements within the District. It is worth noting that Wood Street Village accommodates a higher population than 21 other settlements within the Borough.

The settlement hierarchy identifies that both Fairlands and Wood Street village are large villages below the larger urban area of Guildford, Ash and Tongham and East Horsley. Paragraph 6.2 of the paper discusses how it would be appropriate to direct new development towards the following settlements - Guildford Urban Area, Ash and Tongham Urban Area, East Horsley together with West Horsley (North and South), Shalford, Chilworth, Effingham, Send, Send Marsh/Burntcommon, Ripley, Fairlands and Wood Street Village.

The paper concludes that ‘directing growth to these settlement is in accordance with the national policy which states that “planning policy should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and further focus significant development in locations which are, or can be made sustainable”’.

Appendix C of the statement further sets out that Wood Street Village provides a range of facilities including shops, infant schools, local church, village hall, restaurants and a post office. In comparison, Fairlands also provides similar facilities as well as a primary school, GP surgery and Dentist.
Given the above, it would be appropriate for GBC to consider development opportunities at both villages given their sustainability credentials to meet long term housing and economic needs, both within and beyond the plan period.

In addition, the proximity of the site to Guildford urban area which is the focus of considerable economic growth over the plan period should not be understated. The opportunity for a comprehensive development at Wood Street Village (north extension) and Fairfield (western extension) could assist in meeting Guildford’s local term housing requirements. The delivery of housing would need to balance against a sensitive design approach that would ensure that a permanent landscape buffer is created to ensure long term retention of the individual identities of each settlement. In addition, local infrastructure could be enhanced with a focus on further improving the public transport links to the Guildford.

Given the findings of the Settlement hierarchy report, it is unclear as to why GBC are pursuing strategic development allocations within settlements which scored significantly lower within the sustainability rankings with regard to local facilities and public transport accessibility. It is noted that Normandy (small village) and Flexford (Medium village) are proposed to deliver strategic extensions despite supporting evidence suggesting alternative development locations would be preferable.

As such, it is considered that GBC are not ‘actively managing patterns of growth; nor focussing ‘significant development in locations which are or can be made sustainable’ as required under paragraph 17 of the NPPF.

Whilst it is acknowledged that some sites may fall outside the Green Belt and be the first preference for development, there is a requirement under paragraph 14 of the NPPF for Local Plan to meet its OAN, ‘with sufficient flexibility to adapt to rapid change’ and also assist in supporting the ‘viability and vitality’ of the communities in the villages.

In this regard, GBC has not directed development towards the most sustainable settlements where the need for travel to key employment locations is minimised. GBC should reconsider development opportunities around the settlement of Wood Street village and Fairlands for either small scale Green Belt release or for wider strategic allocations which would be supported by the conclusions of the SA.

As such, the approach taken fails to adopt the most appropriate strategy and nor is it consistent with the requirement to achieve sustainable development as required under paragraph 182 of the NPPF.

**Housing Need**

The Spatial Vision of the draft Local Plan sets out at draft policy S2 that the plan will deliver 13,860 between 2013- 2033. The focus of new development is on existing brownfield sites and at villages which are inset within the Green Belt.

The West Surrey Strategic Housing Market Assessment (September 2015) covers the areas of Guildford, Waverley and Woking Borough Council and sets out housing needs between 2013-2033.

The requirements are as follows:

<table>
<thead>
<tr>
<th></th>
<th>Guildford</th>
<th>Waverley</th>
<th>Woking</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings per annum</td>
<td>693</td>
<td>519</td>
<td>517</td>
</tr>
<tr>
<td>Total over the plan period (2013-2033)</td>
<td>13860</td>
<td>10380</td>
<td>10340</td>
</tr>
</tbody>
</table>

Whilst it is recognised that Guildford are seeking to meet its OAN over the plan period, the Duty to Co-operate Statement (June 2016)(DtC) discusses that whilst Guildford and Waverley are seeking to meet its OAN, Woking is intending to deliver only 292 dwelling per annum against a requirement of 517 dwelling per annum. As such there is a requirement for 225 dwellings per annum between 2012-2027, which in total is 3,150 homes to be accommodated by neighbouring authorities.

Given the requirement for local authorities to undertake the duty to cooperate as set out in paragraph 178 of the NPPF, which requires that public bodies need to invoke the duty through ‘planning issues that cross administrative boundaries,
particularly those which relate to the strategic priorities’ (paragraph 178). As housing is considered to be a strategic priority there is a requirement upon GBC to fully consider opportunities to assist by taking up the unmet need of neighbouring authorities.

Whilst the emerging Local Plan will provide a buffer of 1,984 dwellings within the plan above the OAN requirement through completions since 2013 and outstanding capacity, this only seeks to incorporate flexibility within the plan to accommodate any additional needs of the Borough itself.

However, it is evident from the evidence base which underpins the Local Plan as well as the strategy contained within the Reg 18 Local Plan, that Guildford can reasonably accommodate additional new development in sustainable locations and through Green Belt release.

It is unreasonable for GBC to state at 4.43 ‘we do not consider that we can sustainably accommodate any unmet need arising from Woking’. It should be recognised that whilst WBC are yet to proceed with preparing a new Local Plan, there is still a requirement under paragraph 181 for ‘a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development’.

In 2014, GBC published its Interim Sustainability Appraisal (SA) which discussed opportunities for delivering new development through the expansion of villages by allocating greenfield sites within the Green Belt, noted as ‘Option D Green Belt sites around villages’ within the document- with reference made to safeguarding such sites until after the plan period. It should be noted that this Interim SA supported the Reg 18 Local Plan consultation in July 2014 and had initially intended to proceed with the inclusion of Green Belt release at villages and the allocations of safeguarded sites to ensure flexibility within the Plan, an option that was supported through the evidence base to the Plan.

In contrast, the updated SA (2016) which supports this draft Local Plan states that following the consultation in 2014, the volume of objection to Option D has resulted in the total quantum of growth around villages being ruled-out. However, the SA fails to fully explain and consider the appropriate locations for such growth, with no justification provided as to why development opportunities around Fairford and Wood Street village were not taken forward for allocation above sites such as Normandy except solely on public perception as noted at page 29 of the Appraisal, when the allocations are subject to the same Green Belt considerations and in fact rank lower in the settlement hierarchy. The DtC Statement further states at paragraph 4.36 that GBC ‘has sought to maximise sustainable opportunities to meet needs’, which is clearly not the case.

It is therefore unjustified for GBC to proceed with allocations within the plan when the Council has not considered all reasonable alternatives. In addition, given previously GBC had identified additional capacity for development through a range of safeguarded sites which would have ensure sufficient flexibility in the plan, the removal of sites with minimal justification and GBC stating that it is unable to meet some of WBC unmet need is unfounded and demonstrates that the plan has failed to be positively prepared.

As will be discussed in Section 4 below, GBC should also consider opportunities for smaller Green Belt releases around sustainable settlements which can support the continued economic growth of Guildford and support the long term vitality of villages around the periphery of the main urban area within the District. This will deliver flexibility within the plan period and provided more certainty that GBC will be able to deliver a 5 year supply consistently across the plan period.

Another key consideration for GBC is the current buffer proposed of an additional 1,984 dwellings which could be delivered over the plan period. Whilst the inclusion of a buffer is appropriate, this is not considered sufficient enough given the reliance on consistent delivery from a number of large scale sites within the Local Plan strategy to maintain a five year supply as required under paragraph 47 of the NPPF. These include sites at Stoke (1,000 dwellings), Gosden Hill Farm (2,000 dwellings), Blackwell Farm (1,800 dwellings), land to the south and east of Ash and Tongham (1,200 dwellings), Ockham (2,000 dwellings) and Normandy (1,100 dwellings). Given the above, GBC need to consider the inclusion of smaller sites that can be delivered earlier in the plan period.

In conclusion, it is considered the draft Local Plan is unsound as it has not:

- Been based on effective cross boundary working;
• Not been prepared positively to assist WBC in meeting some of its unmet need;
• Does not provide sufficient certainty on consistent housing delivery over the plan period given the reliance on large scale allocations; and
• Opportunities for sustainable development within the Borough have not been taken forward despite being supported through the evidence base to the draft Local Plan.

Green Belt Release

Whilst it is recognised that the Borough is constrained by both AONB and Green Belt, it is considered that the evidence base on which the Local Plan strategy has been derived does not meet the requirements of the NPPF.

At present, there are a limited number of sites proposed for Green Belt release despite opportunities for new development to be delivered within sustainable locations that will assist Guildford in meeting its OAN over the plan period.

The site was considered as part of parcel H8 which extend northwards between Wood Street village and Fairlands within the Green Belt. Whilst the site was considered to be of high sensitivity, Volume II of the Green Belt and Countryside Study discusses that there are ‘opportunities to accommodate appropriate development without significantly comprising the purposes of the Green Belt’. It is clear from the assessment that the main purposes of the Green Belt within this location is to:

• Check southwards sprawl of Fairlands and northward sprawl of Wood Street Village;
• Prevents Fairlands and Wood Street village from merging;
• Assists in safeguarding the countryside from encroachment; and
• Preserves the setting of Wood Street conservation area.

In this regard, given development opportunities clearly exist to the west and south of Fairlands and were supported through a previous iteration of the Local Plan, the opportunity to create a more comprehensive extension incorporating the site to the north of Wood Street village would assist in delivering a significant quantum of homes, incorporating an appropriate and extensive landscape buffer between the two villages to ensure a defensible and permanent boundary to both villages.

The creation of a new permanent open area of land between the two settlements could deliver far greater benefits as public access could be provided along with the potential for outdoor sport and recreation which would permanently benefit the residents of both villages and the wider District. As such, this would ensure that the requirements of paragraph 81 are met, ensuring that the Green Belt is open and permanent and provides a beneficial use whilst also meeting the five purposes of the Green Belt as stated at paragraph 80 of the NPPF.

Alternatively, GBC should consider the opportunities to deliver smaller scale development at sustainable settlements such as Wood Street village, in locations where the impact on the function of the Green Belt would be minimised and opportunities to incorporate functional and accessible Green Belt land could be explored.

In light of the evidence base above and as mentioned at Section 3, GBC has through the Draft Local Plan Reg 18 consultation held in October 2014 considered opportunities for Green Belt release at Fairford in the form of a sustainable extension to the existing village. This has been subsequently removed.

The former draft wording of Policy 2 (Borough Wide Strategy) still sought to deliver 13,040 new homes over the plan period, although also quoted that ‘ in addition to provide a level of flexibility and to ensure that the realigned Green Belt boundaries endure beyond the plan period, we are safeguarding approximately 99 hectares of land’. In support of this statement paragraph 4.10 included the provision for ‘safeguarded land’ which was an appropriate policy mechanism to meet the longer term development needs of the District.

This was further clarified at policy 9 (Villages and major previously developed sites) which sought to safeguard land at Fairlands, Send Marsh, Normandy and Flexford to meet longer term needs as part of a Local Plan review process and further clarified at paragraph 4.115.
However, when reviewing the Reg 19 Local Plan, it is clear that the Normandy site A46 has been taken forward as a proposed strategic allocation – no longer safeguarded for later in the plan period – whereas Fairlands has been removed entirely from the draft Local Plan as has any reference to safeguarded land. There is no justification provided as to why one site is preferable to the other and nor has regard been given to the findings of the Green Belt and Countryside Study nor the Settlement Hierarchy which should underpin the overarching strategy of the emerging Local Plan.

At paragraph 4.3.12 of the draft Local Plan, it states that Wood Street village and Fairlands are to be inset from the Green Belt, although there is insufficient evidence to justify why opportunities for growth at these larger villages has not been considered further and taken forward into the draft plan.

Given the requirements of paragraph 85 of the NPPF, when reviewing Green Belt boundaries the function of the Green Belt should not be the only consideration when determining whether development would be appropriate. As such, paragraph 85 requires that LPA’s should:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

On the basis of the above, the Reg 18 Local Plan was addressing the key considerations set out at paragraph 85 and there is a sound evidence base to support this approach. GBC acknowledged within the former draft Plan that it was seeking to address the requirements of paragraph 85 explicitly which would have provided more certainty in housing delivery and ensure flexibility over the plan period.

In this regard, whilst supporting the previous approach to the Local Plan strategy consulted on in 2014, we would consider it appropriate for GBC to reconsider the inclusion of safeguarded land within the emerging Local Plan. This said, of the considerations set out at paragraph 85, it is considered that in re-adopting this approach further consideration is required with regard to the following two elements:

- Ensuring that the development boundary will not be altered at the end of the plan period; and
- Boundaries are defined clearly using physical features that are likely to be permanent.

As such, GBC should consider further the relationship of Fairlands with Wood Street village to realise the large scale opportunities for mixed use development within this area whilst reinforcing the quality and usefulness of the Green Belt between the two settlements. The delivery of new development could facilitate securing the permanence and openness of the Green Belt between the settlements and to ensure its use is enhanced and is beneficial to the local community as set out at paragraph 81 of the NPPF.

The draft Local Plan as currently written is unsound and fails to take into account the up-to-date and relevant evidence that has been published to support its preparation. The draft Plan does not seek to ‘promote sustainable patterns of development’ as required under paragraph 84 of the NPPF and nor does the plan incorporate sufficient flexibility through the review of the Green Belt to satisfy that the Green Belt boundary will not need to be altered, either through a future need to accommodate some of WBC’s unmet need, or unexpected changes to housing and employment requirements within the plan period. The inclusion of a higher housing target (incorporating a more significant buffer above the OAN) would be more appropriate, ensure compliance with the NPPF and any unmet needs arising from neighbouring authorities), and assist in the delivery of development in a sustainable location and reduce the reliance of a Local Plan review early in the plan period.

**Strategic Development Opportunities**
The settlement hierarchy notes that Wood Street Village and Fairlands are both larger villages with sufficient provision of local facilities and public accessibility. As such, GBC should be considering the longer term opportunities for the two villages and ensuring that any new development that comes forward as a longer term opportunity is comprehensively designed and delivered to ensure that the identity of each settlement is retained whilst seeking to sustain and support the vitality of the villages themselves.

Land at Dunmore Farm extends to the north of Wood Street village and would be a logical extension that could be well integrated with the existing village. The village is not only within a sustainable location and well related to Guildford, but also would provide additional flexibility within the plan with regard to housing provision if GBC is required to assist WBC in meeting some of its unmet need over the plan period.

The Fairlands allocation would have identified 27ha of land for residential development, would incorporate the provision of SANG and would provide further opportunities to deliver a strategic allocation to the west of Guildford that could incorporate appropriate landscape features to deliver a permanent Green Belt boundary between both villages with the incorporation of functional Green Belt that would deliver benefits to the wider community.

Whilst it is acknowledged that GBC is seeking to meet its OAN, there is still uncertainty over the unmet need of Woking and how this could be accommodated within the scope of the draft Local Plan if considered appropriate. We consider that a more significant housing buffer is required within the Plan given both the strong reliance on larger strategic allocations and the uncertainty of consistent delivery over the plan period and any outcome arising from the Duty-to-Co-operate. In order to be considered sound it is imperative that GBC ensure that the plan is both flexible and robust, with assurance that an early review of the Local Plan strategy will be not required if an increased housing need is necessary within the plan period.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** PSLPA16/4260  **Respondent:** 15685441 / Savills (Catherine Mason)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

RE: Land at Fonthill, Godalming

I write to make comments on the Guildford Local Plan.

Charterhouse School owns and operates a 100 hectare site just outside Godalming. The School has around 800 pupils, all accommodated on buildings within the Godalming site.

The main school site falls within Waverley Borough Council but the eastern part of the site falls within Guildford Borough. Within part of the school’s ownership (and falling within Guildford Borough) is a property called Fonthill (see attached plan). This is a substantial dwellinghouse that is in need of rebuilding.

As can be seen from the attached aerial photos, there are a number of trees within the site and a wide open expanse of open land to the west. This has been subject to various interventions including earth bunding, dating back to when the site was occupied by travellers.

We have no particular objection to the Guildford Local Plan and note the general strategy for the provision of housing. However, we write to advise you of the availability of the Fonthill site, should the Council need to allocate further land for residential development. The site would be contiguous with the existing residential area of Godalming and therefore within easy reach of the services and facilities within the town. There is currently a publicly accessible sports club with...
cafe and shop within the School providing community facilities within short walking distance of the site. Any
development on the site is capable of being entirely enclosed by the existing, established mature tall trees.

The allocation of this site would be entirely compatible with the Spatial Vision of the emerging Local Plan which states
that “The plan also proposes almost 1200 dwellings on non-strategic sites within and around existing villages, some of
which are now inset from the Green Belt, and over 750 dwellings as extensions to existing villages. These dwellings will
offer a variety of housing choice in villages and help contribute to supporting local services and the important role they
play in village life.”

Accordingly, the provision of residential development on a part brownfield site adjoining an existing established town is
considered to amount to sustainable development. Should the Council find, in the course of discussions on the emerging
Local Plan, that it needs to allocate additional sites for residential development then we would be very grateful if the
Fonthill site could be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  "Representations red line - Land at Fonthill.pdf" (829 KB)
"Representations letter- Land at Fonthill Godalming (2).pdf" (84 KB)
I write as a frequent visitor to my family in Compton and a lover of surrounding area as an escape from the metropolis, and also as one of many enthusiastic supporters of the Watts Gallery.

Compton is a beautiful and historic village that is known and loved by a surprisingly large number of people who have no connections to it and do not live anywhere near it. Its attraction is due partly the houses that line its narrow thoroughfare, The Street, partly its position close to an Area of Outstanding Natural Beauty and partly the draw of the Watts Museum, St Nicholas’s Church and the Withies pub.

It seems that Guildford is bulldozing The Local Plan through without considering fully enough the overall effect it will have not only on Compton (particularly on the Street (A3000) which is already at saturation point and producing higher pollution than is permissible or desirable.) but also on the surrounding Green Belt and ANOB areas.

Fiona Curtis has summed up the objections better than I could and I thoroughly endorse all that she has written. I copy her letter below and ask that all of her points should be thoroughly dealt with. Of course we need more housing but it should be firstly on any available brownfield sites and not before the transport and environmental problems have been addressed.

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the plan.

The Employment Land Needs Assessment

I object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all
existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

**Infrastructure**

**I object**

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

**The Highways Assessment**

**I OBJECT**

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight
restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF'. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/ business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queuing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.
The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

**The Spatial Hierarchy**

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

**Strategic Housing Market Assessment (SHMA)**

**I Object**

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

**The Land Assessment**
I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

**Green Belt & Countryside Study**

I object

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2 sets out the development targets for housing, employment and gypsy and traveller pitches. There are a number of factors to assess in establishing if these targets are robust and correct. The first consideration must be an establishment of whether the Council has made a robust assessment of its full objectively assessed housing need (FOAHN). Once this has been considered factors which may prevent the Council from meeting its FOAHN can be taken into account to arrive at the housing requirement for the district.

The Council commissioned GL Hearn to produce its evidence on housing needs, the work was carried out alongside Waverley and Woking districts to form the West Surrey Housing Market. The report produced in October 2015 concluded that, for Guildford, the FOAHN was 693 dwellings per annum.

Having reviewed the evidence there are a number of issues which Gladman believe require further consideration by the Council. These are:-

1. The base date projections are now out of date following the publication of the 2014 household projections on the 12th July 2016.
2. The market signals uplift applied to Guildford is not sufficient. Affordability in the area is chronic. Inspector’s reports in other Local Authority areas such as Canterbury, an area with less housing market pressure than Guildford, have endorsed at least a 20% uplift. The figure for Guildford quoted by GL Hearn is just 31 dwellings per annum.
3. The allowance for economic growth seems weak when considering the strength of the local economy.

The Council is in need of a refresh and update of the work in order to properly inform policy S2. However as we have outlined establishing FOAHN is only the first part of the process, and just because the FOAHN may increase it does not automatically follow that the housing requirement for the district should also increase, or increase by the full amount. Guildford is a highly constrained authority with much of its area washed over by Green Belt, however it is important to assess the full housing need figure in order that the Council can be clear as to what it can meet, what it can’t meet and what discussions it needs to have with neighbouring authorities about delivering its unmet housing need.

As drafted at present the policy states it will be delivering 13,860 homes between 2013-2033. A stepped trajectory included in the policy explains that the annual housing target from 2018-2033 is 10,395, the Councils Table 1 shows a surplus of housing sites to build flexibility in meeting this target. Therefore whilst Gladman question the robustness of the SHMA and note it is in need of updating to fully establish the FOAHN for Guildford, Gladman are supportive of the approach taken by the Council in meeting housing needs within the area. The overall figure, we believe, may be an underestimation but the Council is proactively trying to meet it despite the constraints of the district.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4291  Respondent: 15689793 / Gladman Developments (Mat Evans)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Conclusion

At present therefore, Gladman are concerned that the establishment of FOAHN is not robust and therefore the housing requirement within the plan is based on evidence which is not justified or up to date. We would however wish to endorse the Councils approach to seeking to deliver housing in an area of heavy green belt constraint. The Councils approach in proactively and robustly assessing its green belts to help deliver much needed housing and economic growth is to be supported, therefore whilst we believe the FOAHN is higher than that established by GL Hearn it does not mean that the Council have not prepared an otherwise sound plan. As we explain above even with a higher FOAHN the housing requirement for Guildford may well be appropriate.
We trust that these representations are helpful, we would request the right to be heard at the reconvened examinations to discuss the above points in further detail and to elaborate on the points expressed in this letter.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/4292  **Respondent:** 15689953 / Environment Agency (Oliver Rathmill)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**1.1 Environment Agency Position on Plan as a whole**

**1.1.1 Points of soundness summary**

We welcome and support a number of the changes that have been incorporated into the Plan since we reviewed the Draft Guildford Borough Local Plan: strategy and sites dated July 2014. However, we consider the Plan to be UNSOUND in its current form due to issues relating to:

- Infrastructure Delivery Plan – Water quality
- Flood Risk Sequential and Exception Tests - site allocations and the justification for promoting certain sites
- Policy P4 – Flooding, flood risk and groundwater production zones
- Site Allocation Policies – safe access and egress of allocated sites A5 and A13

In its current form the Plan does not meet the tests of soundness in terms of being justified, effective or consistent with national policy. These points are summarised below.

- With regards to water quality the Plan does not reflect the evidence submitted in the Infrastructure Delivery Plan for wastewater capacity issues, which may result in an adverse impact on water quality. The Plan is not consistent with the National Planning Policy Framework (NPPF), paragraph 109, and is not justified by a robust evidence base.
- With regards to the Flood Risk Sequential and Exception Tests, we do not consider that sufficient evidence has been presented in this supporting document to justify the conclusions drawn in the Plan with respect to the allocation of certain sites. Without this evidence the Plan is not justified.
- With regards to Policy P4 we do not consider that sufficient reference has been made to the impacts of climate change on the flood risks associated with development. We consider that without specific mention of the flood risks associated with climate change that the Plan is not consistent with paragraph 99 of the NPPF.
- With regards to flood risk three of your allocated sites; A5: Jewsons, Walnut Close, Guildford; A13: Kernal Court, Walnut Close, Guildford; and A14: Wey Corner, Walnut Tree Close, Guildford, do not have the evidence on access and egress to support their allocation in the Plan. Without this evidence the deliverability of these sites is questionable and their inclusion is not consistent with NPPF paragraphs 100-102 of the NPPF.

Further details on these issues are provided in section 1.2, 1.3, 2.1 and 3.1 of this letter respectively.

**1.2 Supporting Document: Draft Infrastructure Delivery Plan June 2016**

**1.2.1 Points of Soundness**

We welcome paragraph 2.22 in the Plan and promotion of the principle that “Pressure on existing infrastructure and additional stress caused by planned growth must be addressed”. However, within the draft Infrastructure Delivery Plan (IDP) there is no evidence relating to environmental capacity and water quality and the impact of the growth being proposed in terms of the sewerage infrastructure needs and the impact of Water Framework Directive (WFD) objectives. Without this evidence the Plan is not based on robust evidence or consistent with national planning policy and is unsound.
Paragraph 3.10 and 3.11 state that Thames Water have advised that there is insufficient wastewater infrastructure in the Borough to satisfactorily accommodate some of your proposed development sites.

It is indicated that smaller allocated sites will provide the majority of the supply in the first five years of the Plan. However, some of these smaller sites have also been identified as causing an infrastructure concern for Thames Water. It is likely that planned Sewage Treatment Works (STW) upgrades will be in line with the next business planning period (2020-2025), unless additional funding can be obtained. The schedule of development indicates 1050 homes will be built before 2020. This suggests housing is proposed in advance of adequate infrastructure being in place which would not be consistent with paragraph 177 of the NPPF.

Therefore, we do not believe that the Plan is justified by your local evidence base or consistent with national planning policy and guidance.

1.2.2 Overcoming this point of unsoundness
To overcome this point of unsoundness we recommend that a Water Cycle Study (WCS) (or equivalent assessment) needs to be completed to assess the impacts on water quality and WFD objectives of the cumulative growth proposed within the Plan (13,860 homes).

1.3 Supporting Document: Sequential and Exception Tests
1.3.1 Points of Soundness
Within the Plan and this supporting documents we find that the Plan is unsound because the flood risk sequential and exception tests have not been appropriately applied to justify the conclusions drawn in the Plan.

Point 1 – It is unclear from Appendix A (Stage 2) why some sites appearing to be ranked as having low flood risk in the table appear to have been discounted due to “Suitability concerns: high flood risk” while other sites with higher flood risk have been promoted as site allocations. For example, sites LAA reference 2167 and 2168 have both been considered as potential traveller accommodation sites and both appear to be in Flood Zone 1 but have been discounted due to “Suitability concerns: high flood risk”. In contrast, LAA reference sites 2106 and 241 both containing Flood Zone 3 have both been promoted to site allocations A54 and A50 respectively.

On further examination of Appendix A (Stage 3) in the Flood Risk Sequential and Exception Test and the associated Site Proformas within the Level 2 Strategic Flood Risk Assessment it does become clear that the potential allocated sites have a flood zone breakdown as follows:

<table>
<thead>
<tr>
<th>Site Allocation</th>
<th>A50</th>
<th>A54</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAA Reference</td>
<td>241</td>
<td>2106</td>
</tr>
<tr>
<td>Address</td>
<td>Land at Whittles Drive, Aldershot Road, Normandy</td>
<td>Lakeview, Lakeside Road, Ash Vale</td>
</tr>
<tr>
<td>Flood zone 1</td>
<td>73.7%</td>
<td>72.7%</td>
</tr>
<tr>
<td>Flood zone 2</td>
<td>20.3%</td>
<td>9.6%</td>
</tr>
<tr>
<td>Flood zone 3a</td>
<td>6%</td>
<td>17.7%</td>
</tr>
<tr>
<td>Flood zone 3b</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

As such both sites A50 and A54 appear to be deliverable. However, as no site assessment or further explanation is provided for excluding 2167 and 2168 other than the phrase “high flood risk” when considered against the reasonable alternatives the decision made to exclude these sites and include site A50 and A54 appears to be unjustified.
Point 2 – Appendix A (Stage 2) of the supporting evidence document Flood Risk Sequential and Exception Test provides a list of all the potential sites provided to GBC for consideration (after those sites which are not suitable in planning policy terms had been excluded in Stage 1). These have been ranked in order of flood risk preference (from least preferable to most preferable) based on the highest flood zone classification within the site. Following an assessment, where sites have not been taken forward as potential site allocations you have provided a brief reason for not doing so.

However, many sites have been discounted for being “Not identified in the Greenbelt and Countryside Study” but no further detail is given in the table or Proposed Submission Local Plan (2016) – Flood Risk Sequential and Exception Test methodology and outcomes. It is unclear why this reason may overrule flood risk, a constraint that potentially places people and property at severe risk.

1.3.2 Overcoming these points of unsoundness
Point 1 – We recommend that you expand upon the discounting reason “high flood risk” within this table to provide justification of the decisions made.
Point 2 – We recommend that an explanation is given in the methodology to justify why “Not identified in the Greenbelt and Countryside Study” is reason for discounting potential allocation sites.

1.3.3 Points of clarity and accuracy
Within Appendix A (Stage 3) there appears to be an error on the heading of columns the Stage 3 table (pages 35-38). The columns to the right of the Stage 3 table indicate the compatibility of different flood risk categories according to the flood zone in which they are located. The positioning of “Exception Test” in these columns appears to have been incorrectly carried out.

For instance, Table 3 (reference ID 7-067-20140306) of the National Planning Practice Guidance (NPPG) does not indicate that the Exception Test is required for less vulnerable development but the Stage 3 table indicates that it is for a number of sites. Table 3 of the NPPG also indicates that more vulnerable development in flood zone 3a should pass the Exception Test. However, your Stage 3 table indicates that it would not be an appropriate development type for this flood zone, while highly vulnerable development would be should it meet the requirements of the Exception Test.

In contrast this does appear to have been carried out correctly in Appendix 1 Stage 2. The route of this problem may be a formatting issue with the columns in the Stage 2 table which do not follow the sequence in the NPPG:

<table>
<thead>
<tr>
<th>Essential infrastructure</th>
<th>Highly vulnerable</th>
<th>More vulnerable</th>
<th>Less vulnerable</th>
<th>Water compatible</th>
</tr>
</thead>
</table>

We believe that the Stage 3 table has been incorrectly labelled in this sequence:

<table>
<thead>
<tr>
<th>Highly vulnerable</th>
<th>More vulnerable</th>
<th>Less vulnerable</th>
<th>Water compatible</th>
<th>Essential infrastructure</th>
</tr>
</thead>
</table>

Please can you confirm this formatting issue is indeed the reason behind this inconsistency with this essential element of your Local Plan evidence base?

1.4 Additional Comments on the Plan as a whole
We welcome and support the Spatial Vision (Section 3.0 – Our vision and ambition) to guide the creation of the plan. However, alongside the existing themes outlined in the Spatial Vision we would recommend the inclusion of a section on the implementation of a green and blue infrastructure network that contributes to protecting and enhancing the water environment, improving habitat connectivity between designated sites and important habitats, managing flood risk, reducing diffuse pollution and re-connecting people with nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Assumptions adopted

I understand the number of houses proposed arises from a strategic housing market assessment (SHMA) that was generated by a consultant’s mathematical model the basis of which has not been revealed to any member of the public nor apparently to Guildford Borough Council. This evidences a lack of rigorous testing and a willingness to conceal which is clearly unacceptable on both counts.

Having taken the SHMA housing number (the basis of which is unknown) it is understood that this has been further increased by Guildford Borough Council to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. One is therefore led to question the rationale and wisdom of those who have been responsible for the preparation of these proposals.

Effectively all of these lead to an increase of up to 35% in existing West Horsley households – which is greater than any other single area within the Borough and certainly dramatic by any standards.

How can any public officer seriously propose such a dramatic impact upon the lives of people without a more rigorous and study and understanding of the parameters adopted and basis of the proposals put forward?

As submitted, these proposals clearly require a total “re-think” as they affect West Horsley and perhaps other locations as well should the same fundamental discrepancies have similar application elsewhere.

As such, I wish to formally object to the proposals submitted and suggest that they require a complete reconsideration and that the basis on which they have been considered is not only flawed but requires greater transparency to permit meaningful consideration, not only by the officers who have put forward these proposals but also by the electorate that they are effectively paid to look after!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the figure of 693 houses per annum in the borough being too high (Appendix D). The Plan’s proposed growth is based on the SHMA report. I have been unable to locate a copy of this and therefore do not believe the information available is conducive to a fair consultation. The 693 house per year is more than double the figure of 322 used in previous plans and again seems disproportionate and without the information available to verify the high figure, the decision lacks transparency.

I kindly ask that the above considerations are taken into account and that the Plan is revised accordingly.

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 Plan because the housing numbers have not been substantiated in a manner open to public scrutiny and appear to be deeply suspect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4372</th>
<th>Respondent: 15704737 / Sarah Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>
<tr>
<td>I have always felt that the housing need number is too high. 693 is far too high and when you read the detail of the workings, although the full detail appears unavailable which is unacceptable, there are huge errors. This was commented on and flagged in the last draft consultation but appears to not have been addresses. GBC should not blindly follow the recommendations from GL Hearn, especially if they are unable to supply GBC with detail of the underlying formulas! I object to the usage of green belt in any area of the plan. This all needs to be reworked based on a new and correct housing need figure. Green belt must be sacrosanct, as promised by the Government.</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>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4555</th>
<th>Respondent: 15705537 / G-Bug – The Guildford Cycling Campaign (Doug Clare)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>
<tr>
<td>Appendix D Include reference to the Guildford Borough Transport Strategy 2016</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>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4392</th>
<th>Respondent: 15705729 / Martyn Heard</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</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>
I object to the Strategic Housing Market Assessment. SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

These figures are at odds with figures used previously @ 322

As this figure cannot be verified, the lack of transparency is not right for consultation on the Plan

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 2016 local plan in its current format. I do not believe that it is sound and is not yet fit for implementation.

1. The council relies on a strategic housing making assessment that is in question. The council have not scrutinised the figure provided and rely purely on the fact that other councils have used the consultant GL Hearn to assess the housing need. The SHMA appears to be exaggerated against ONS data. Two independent reviews have identified similar faults, which suggest that the figure is too high and inaccurate. They also identify that the recent referendum result relating to Europe may have an impact on economic growth and consequently should be reviewed. The SHMA must be reviewed to ensure that it is accurate before the housing figure is agreed.

2. The council have chosen not to impose any constraints in respect of the OAN.
   1. The Council highlight that the borough is 89% greenbelt and yet proposes to build approximately 65% of new development on greenbelt.
   2. The council appropriately identifies that the enhancement of the A3 is essential to the scale of development possible within the local plan. Page 21 Strategy and sites states 'The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford'. Highways England have made no commitment to improve the A3 and yet the local plan still seeks to deliver the full housing target through the delivery of three of its four strategic sites sighted directly beside the A3. The transport survey also highlights that traffic will be impacted and congestion worsened irrespective of what improvement measures are put in place.

3. The Council have failed to consult effectively with infrastructure providers prior to publishing the draft local plan and as a consequence the Raleigh school has only recently put forward a proposal to build a new school on site A41. I am unable to comment on this because I do not have sufficient information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the use of the ‘Green belt and countryside study 2014’ within the evidence base. This is a subjective view of the green belt provided by one company, it is not evidence. It does not provide exceptional circumstances to remove land from the green belt.

I OBJECT to the use of the transport study within the evidence base. The SINTRAM model is designed for major routes and is not suitable for local roads as it takes no account of junctions. The three hour period also skews the data disproportionately downwards. This means that it will not necessarily provide a true reflection of traffic movement within Guildford. A different model should be used and the peak times adjusted to accurately reflect traffic, particularly within rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4405  Respondent: 15709153 / Heather Sohl  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am a Guildford Borough Council resident, living in the Normandy/Flexford area and strongly object to the Guildford Borough Council (GBC) Proposed Submission Local Plan: Strategy and Sites, June 2016 (the Plan). I particularly have strong objections to policies A46 and A47.

Objection to the evidence base

Evidence is expected to be up-to-date and relevant. However, the evidence that GBC presents is not entirely accurate nor up to date.

Inaccurate evidence on SNCIs.

In the Settlement Profiles document (2013) which is part of the Settlements Hierarchy referred to in the Evidence Base (Appendix D of the Plan) GBC state (page 49) “There is a Site of Nature Conservation Importance (SNCI) to the north of Normandy” whereas in fact there are four (and possibly even five) SNCIs to the north of Normandy namely: Withybed Copse and Henley Park Fields SNCI, Normandy Common SNCI, Wyke School Wood SNCI, and Wyke Churchyard SNCI, and arguably part of Wanborough and Normandy Woods SNCI.

In addition to these, there are two others in Normandy Parish, namely Little Flexford SNCI (which is directly affected by Policy A46), and Broadstreet Common and Backside Common SNCI, as well as the remainder of Wanborough and Normandy Woods SNCI.

I believe that this is important evidence that has been missed and, had it been included correctly, A46 and A47 would not have been included in the plan.

With reference to Policy 12, the Plan has been developed without due assessment of the implications to local highways of the proposed development under policy A46.

Surrey County Council traffic simulations verify that the level of traffic on the local roads is already above capacity the roads were designed for. With no evidence of secure funding for any improvements to the A3 during the life time of the Plan the local road network will be even more affected. The local road network is incapable of coping with the development of the scale proposed in A46, and there is no evidence that this has been considered, nor that provisions for improvement in the plan period are feasible or viable.
I understand the GBC plans to build a tunnel to ease traffic congestion along the A3, however, it will not be completed during the life span of this Local Plan.

I believe that this is important evidence which is correctly assessed would have meant that A46 would not have been included in the plan.

**Flood risks have not been considered by GBC**

As A46 is within 5km of the Thames Basin Heaths Special Protection area (TBHSPA), (Policy 1: Sustainable Development) GBC should have considered the Habitats Regulations (NPPF) ‘water stress’. Yet this has not been considered. GBC’s Surface Water Management Plan (SWMP) has excluded the land north of A46, flood risk 3a and 3b (identified on the Environmental Agencies flood risk map). Loss of 3b an ‘effective floodplain’ will severely impact on the surrounding areas identified on the SWMP.

I believe that this is important evidence which is correctly assessed would have meant that A46 would not have been included in the plan.

The existing SPA Avoidance Strategy 2009-2014 was already extended to 2016 but has not been completely reviewed. The needs of the SPA cannot be assessed against the proposals brought forward under the Local Plan without this being completed.

The Guildford Open Space, Sport and Recreation Assessment document was also produced too late to be properly considered in relation to the proposed sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/4413  **Respondent:** 15710369 / Steve Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Proposed Submission Local Plan consultation**

I am writing to strongly object to the Proposed Submission Local Plan dated June 2016, mainly in relation to the Normandy and Flexford area where I am a resident. In particular I object to policies / sites A46 and A47. I have broken my response down into the relevant sections.

I am by profession an environmental consultant specialising in advising local authorities on matters of ecology, open space and planning. I am a former local government Assistant Director in these areas.

1. **The evidence base and submission documents**

I object to the proposed Local Plan being put forward without an up-to-date evidence base and thus giving the opportunity for incorrect conclusions to be drawn. A number of documents are missing, only available late in the process or incorrect. Errors and omissions need to be corrected and significant late evidence should be properly considered when making such important judgements. Arguments made based on flawed, inaccurate or inadequate evidence cannot be valid.

Specifically:
• Surrey County Council’s Strategic Highway Assessment and Guildford’s Borough Transport Strategy were both produced very late in the process and their content is not and cannot have been fully taken into account in the production of the Local Plan. Infrastructure capacity, condition and future changes / funding are key to making decisions in the Local Plan and these issues appear weak in the Proposed Submission Local Plan in relation to the proposed Sites.
• The Guildford Open Space, Sport and Recreation Assessment document was also produced too late to be properly considered in relation to the proposed sites.
• The Settlement Hierarchy and Settlement Profile for Normandy / Flexford states that “there is a Site of Nature Conservation Importance (SNCI) to the north of Normandy”. There are actually several SNCIs in Normandy, including south of Normandy within the allocated A46 site.
• The existing SPA Avoidance Strategy 2009-2014 was already extended to 2016 but has not been reviewed for the future. The needs of the SPA – arguably one of the most important protected sites in southern England – cannot be assessed against the proposals brought forward under the Local Plan without this being completed.

I believe that Sites A46 and A47 could not be included in the draft proposals if the evidence were correct and properly assessed.

Lack of consistency of approach on ‘Sustainability’ versus ‘Sensitivity’

Two of the key concepts that underpin the Plan are ‘sustainability’ (i.e. an areas suitability for development - Policy 1) and ‘sensitivity’ (its importance in terms of protecting the Green Belt). Individual settlements are ranked on both counts, and development is favoured in the most ‘sustainable’ ones; conversely, the barrier is higher in the most ‘sensitive ’ones. What is significant is that for the purposes of assessing ‘sustainability’ Normandy and Flexford have been treated as one settlement, whereas for ‘sensitivity’ they have been treated separately. This is simply inconsistent. In fact the original data (used in the first consultation) identified Normandy as one settlement. The data was rewritten in 2014 dividing the settlements in two. It is not appropriate to alter data in this way.

In conclusion, I feel strongly that the draft Local Plan does not meet sufficient standards to justify the proposed development at Sites A46 and A47, as detailed above, and therefore object to this Local Plan. Thank you for taking my comments into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Thank you for your e-mail and I now return a copy of your plan having hatched in red those areas of the Estate which should be excluded from your assessment as public open space. I’m afraid the quality of the plan you send me is not that good so I have only been able to roughly identify the land that should be excluded. However as you will see it does cover a significant part of the Estate.

Having re-read again your criteria set out on page 41 of your assessment I believe I have correctly identified the land which does not fulfil the criteria as it is land that is not open for informal access either on a permissive or managed basis. Whilst there are some rights of way running through or adjacent to these areas of land they are no more open space than any other field within the locality. The areas I have identified are all run as areas of commercial woodland or commercial agricultural land.

I look forward to receiving your confirmation that these areas will be correctly identified and formally excluded from your assessment.

Please advise if we need to make a formal objection or whether this is sufficient for the purpose.

If you require me to identify the land more accurately then please send me a better quality plan.

I look forward to hearing from you.

1/2

I have been forwarded a copy of your Guildford Open Spaces, Sport & Recreation Assessment of June 2016 and am extremely surprised to see that without any form of consultation you have included large areas of the Albury Estate which are private and not open to the public as either accessible natural green space or park and recreation ground.

Significant parts of the Albury Estate are indeed open to the public but this does not extend to the following areas which are shown on the map for the Tillingbourne Ward contained in Appendix 2 of your assessment.

Some of the following areas may have public footpaths close by them, they are not publicly accessible spaces and should therefore be excluded:

- The Netherlands
- Chantry Wood
- The Boxes
- Tickners Copse
- The Warren
- Kiln Rough
- Far Plantation
- Mustard Copse
- Jugs Copse
- Broomfield & Blackheath Woods
- Silverwood
- Albury Park

On behalf of the Estate I wish to object in the strongest possible terms to their inclusion as they are private areas and I request that they are deleted from your plan.

I appreciate that it may be difficult for you to identify exactly which parts of the Estate are available to the public and which are private and if you care to send me a more detailed version of the plan contained in Appendix 2 I will happily draw the correct boundaries so that you can correct the plan.

I look forward to hearing from you with confirmation that the private areas of the Estate will be removed from your assessment forthwith.

2/2
### Comment ID: PSLPA16/4476  Respondent: 15717217 / Ian Ferguson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?**

Loss of Green Belt, this is of particular concern as its will set a precedent which will have long term repercussions across the county.

I do not believe that the demand is actually there for the number of houses that have been proposed 693 almost double the previous stated figure of 322.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPA16/4499  Respondent: 15724353 / Arvnid Parmar  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate?**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the figure of 693 houses per annum in the borough being too high (Appendix D). GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
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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: PSLPA16/2564  Respondent: 15728289 / Sir Rocco & Lady Alicia Forte  Agent: Savills (L Robertson)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposed Submission Local Plan: strategy and sites 2016 – Representation on behalf of Sir Rocco Forte and Lady Aliai Forte owners of the Ryde Farm Estate.

I refer to previous submissions made in respect of the emerging Local Plan including our letters of 22nd September 2014 and 8th September 2015. It is with considerable disappointment that our client finds that the proposed Submission Plan has excluded the site at Ripley Lane, West Horsley (previously known as Land to the west of West Horsley (south) – Policy Reference 73) from its proposed allocations.

This objection to the Plan is based upon our view that the Green Belt assessment for this site is flawed and that this the Plan has not correctly considered all of the reasonable alternatives at West Horsley. We are of the view that the Council has misdirected itself in that respect when concluding that the site should be removed from the proposed allocations.

When the revised Plan was presented to the Council on 13th April 2016, the officers provided a briefing note which summarised how the Plan has changed. It stated:

“This note seeks to focus on the changes made to the draft Local Plan and the reasoning behind those changes. Much of the evidence base has been updated and, together with the representations received as part of the formal consultation process, has been instrumental in informing changes to the plan. The use of the spatial hierarchy to accommodate sustainable development remains fundamentally unchanged. However, the use of the Sustainability Appraisal and the Green Belt sensitivity assessment have resulted in significant changes to the plans site allocations, our emphasis] The site allocations are concentrated on larger sites and a number of allocations on Green Belt sites of high sensitivity have been removed from the plan.”

The briefing note also states:

“A number of sites have been removed around Send and a site adjacent to West Horsley.”

It is not clear if this refers to the Ripley Lane site, but it is reasonable to assume so.

However, we consider that the Ripley Lane site was assessed incorrectly and that the result was an incorrect scoring of the site against Green Belt objectives to its disadvantage as against other sites within the West Horsley area and beyond.

The site does not threaten unrestricted sprawl as it is contained with the perceived settlement boundary as defined by the Council.
The site clearly has no function in contributing to the **merger of settlements**. Parcel D6 of the Green Belt Sensitivity Analysis was clearly intended to identify the open greenbelt space between the West and East Horsleys, but the Ripley Lane site is on the western side of West Horsley. The conclusion that the site would cause a merger between settlements is clearly wrong.

The assessment that parcel D6 assists in safeguarding the setting of the East and West Horsley Conservation Areas is a misinterpretation of the national guidance. The proper consideration is the “setting and special character of historic towns”, not individual Conservation Areas. Conservation Areas provide a protection regardless of whether they are in a Green Belt or not. Even if this were not the case, the Ripley Lane site is not adjacent to any Conservation Area and the degree of inter-visibility between the site and the West Horsley Conservation Area (the nearest) is severely restricted due to the vegetation around Pincott Farm.

We have also identified further flaws in respect to the scoring of other sites in the West Horsley area which has prejudiced our client’s site.

We would therefore request that the Council corrects the serious flaws in the assessment of our client’s site and re-instates the allocation status previously offered in earlier versions of the Local Plan prior to Submission of 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:** PSLPA16/4171  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

LAA, February 2016

The site was highlighted for development in the LAA. The document notes that the northern part of the site forms part of the built up area of the village and the southern part of the site is visually and physically contained by woodland.

The site is in flood zone 1 (at low risk of fluvial flooding) and the currently open land to the rear is technically located on Grade 3 agricultural land, albeit it has no current or realistic future agricultural potential.

**Green Belt and Countryside Study, 2014**

The Council have undertaken a detailed assessment of the Green Belt and Countryside which has led to the identification of the various revisions to settlement boundaries, including the revisions to the Ripley settlement. The subject site was highlighted in this document as a logical location for the extension of the settlement.

Development of the site would not undermine any of the five NPPF purposes of the Green Belt. The site is not necessary to keep permanently open and its release will ensure that the Green Belt boundaries for the Ripley settlement endure beyond the plan period (NPPF Paras 83-85).

**Landscape and Character Assessment (LACA), 2007**

The site is not within a sensitive location within the LACA and development of the site could contribute positively to enhancing the key characteristics of the ‘Send Gravel Terrace’ landscape character area within which the site is located. The development of the site offers an opportunity to reinforce the historic core of Ripley and the redevelopment scheme would not impact on its distinctive character. The development plot here is well contained by both the existing settlement
on the frontage and a mature landscape buffer to the south. Development would clearly not lead to fragmentation of the
landscape.

The site already functionally forms part of the settlement and the currently undeveloped land to the east is enclosed on all
sides. The development of these sites would form a natural rounding off of the settlement and will offer opportunities to
rationalise/strengthen boundary landscaping particularly on the southern boundary of the site.

The site does not make “an important contribution to the openness of the Green Belt” and it is considered that the site
performs no Green Belt role and is “unnecessary to keep permanently open.”

Outline Planning Application

Outline proposals were submitted in June 2016 for a scheme comprising 26 residential units and retail on the site
frontage, with all matters reserved except for access.

Whilst the application has been refused the principal reason for refusal related to objections on Green Belt policy
grounds. Whilst our Client disputes the position adopted by the Council, the proposed amendments in the emerging plan
to the village boundary and the insetting of the village from the Green Belt would, in any event overcome the concerns
raised.

Technical concerns were also raised relating to the impact on the conservation area and loss of employment. Our Client
again disputes the policy approach adopted and the conclusions reached, however, these issues also have no bearing on
the site allocation given that they relate to the specific form of development and the merits of protecting existing short
term uses.

The other reasons for refusal related to the requirement to secure financial contributions and a commitment to affordable
housing. These issues may be addressed through the completion of a S106 agreement and have no bearing on the draft
allocation.

Overall, the reasons for refusal relate to the existing policy context and do not undermine the underlying principle of
allocating the site for housing.

A technical note with further supporting information accompanies these representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4187  Respondent: 15746081 / Highways England (Patrick Blake)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation
including comments on this element of the consultation documents and/or associated evidence base.

Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough
Council. See the second attachment for this letter.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Highways England letter 18 July 2016 - Representation to consultation.pdf (7.7 MB)
Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf (1.2 MB)
GGG objects to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

Key parts of the evidence base are flawed or based on withheld assumptions.

The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357 sq m of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

“There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/2374  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4194  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I understand that the demographic model, behind the Strategic Housing Market Assessment report, has not been made available to Guildford, Waverley or Woking Councils, who commissioned it. Nor is it available for public scrutiny by the people who paid for it. This is not acceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/94  Respondent: 17240193 / Anita Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp173/271  **Respondent:** 17303553 / Anita Fitchie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

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:** pslp173/274  **Respondent:** 17303713 / Andrew Fitchie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

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: pslp173/335  Respondent: 17323265 / Simon Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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  ◦ It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe
inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/337  Respondent: 17323585 / Jane E Foxon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/685  Respondent: 17382113 / T J Lindsay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am particularly worried by the idea that a central bus-station could be dispensed with altogether - just having stops on streets. I object to this.

Infrastructure - DI
Current infrastructure does not meet current needs so it is very worrying to see so much development being planned running ahead of the infrastructure. I object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/594  Respondent: 17447169 / Hazel Eve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not agree that the evidence used for the Proposed Submission Local Plan: strategy and sites (2017) is adequate, up-to-date and relevant. The housing number is greatly exaggerated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/608  Respondent: 17456961 / Justine Ayears  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the housing number of 693/annum as no constraints have been applied – the GL Hearn methodology has compounded past errors in international migration forecasts and the whole SHMA needs to be re-visited and corrected as a matter of urgency.
2. I object to the continued use of the Green Belt and Countryside study as part of the evidence base. It is a subjective and inconsistent document that pays no regard to the impact of the current proposals on the setting of the AONB for example.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/624  Respondent: 17461921 / Linden Homes South  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Green Belt and Countryside Study

We note that the site promoted by Linden lies within Parcel H15 of the Green Belt and Countryside Study produced by Pegasus on behalf of the Council in support of the emerging Local Plan.

Parcel H15 is broadly rectangular in shape and extends approximately 0.85 miles westwards from the defined settlement of Flexford. The parcel extends approximately 0.6 miles from the edge of the site promoted by Linden.

Appendix 2 of Volume 1 of the Study dated February 2013 identifies a series of potential development areas surrounding urban areas and villages. Four such areas are identified at Flexford as identified in Figure 1 below. Of these four areas, one potential development area was identified to the west of Flexford, occupying approximately half of the land now promoted by Linden.

[Figure 1: Extract from Appendix 2 of the Green Belt and Countryside Study Volume 1 (February 2013)]

Volume 1 of the Study sets out that:
“Land parcels H10, H11, H12, and H15 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the north of the railway line, between Westwood Lane, Pussey’s Copse and Glazier’s Lane (H12-C); and between residential properties on Glazier’s Lane and Strawberry Farm (H10-B). PDAs have also been identified to the south of the railway line, continuous with residential properties on Beech Lane, Westwood Lane and Green Lane East (H15-A); and between The Paddocks and West Flexford Lane (H11-D). The PDAs are generally enclosed by undulating topography, mature woodland and hedgerow treecover. H15-A is located to the north of Ancient Woodland and the SNCI at Wanborough Wood and at Highfield Copse to the west of Flexford. H10-B is located to the north of H11-D, located within an SNCI to the east of The Paddocks residential area. Ecology is therefore a significant constraint that would need to be addressed with respect to any proposed development within H11-D.”

Table 2 of Volume 1 set out the sustainability credentials and estimated residential development capacities of potential development areas surrounding villages across the Borough. In relation to development within Parcel 15, table 2 identified that it had an estimated capacity of 114 dwellings SUSTAINABILITY CREDENTIALS.

Volume 2 of the Study includes a table which sets out how each parcel relates to four Green Belt purposes. The table below sets out the summary contained in the Study in relation to Parcel H15 alongside a comment on behalf of Linden. Volume 2 of the Study indicates that Parcel H15 scores ‘3’ indicating that it contributes to three of the four Green Belt purposes.

<table>
<thead>
<tr>
<th>Green Belt Purpose</th>
<th>Comment in Volume 2 of the Green Belt and Countryside Study</th>
<th>Turley Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>To check the unrestricted sprawl of large built-up areas</td>
<td>Checks southward sprawl of Flexford</td>
<td>Parcel H15 is located to the west of Flexford and plays no role in checking the southward sprawl of the settlement. In relation to the westward growth of Flexford we note that Parcel H15 extends approximately 0.85 miles from the edge of the settlement and 0.6 miles from the edge of the site promoted by Linden. Furthermore, to the west and south of the site promoted by Linden there are a number of areas of woodland which would serve to limit the onward expansion of Flexford. We therefore consider that the site promoted by Linden can be developed without leading to the unrestricted sprawl of large built-up areas.</td>
</tr>
<tr>
<td>To prevent neighbouring towns from merging into one another</td>
<td>Prevents Flexford and Ash Green from merging</td>
<td>We understand that there is approximately 1.23 miles between the western edge of Flexford and Ash Green. If the site promoted by Linden were developed then there would be a remaining and significant distance between the settlements of approximately 0.96 miles. Furthermore, the presence of the woodlands to the west of the site promoted by Linden would serve to limit the further westwards expansion of the settlement. We therefore consider that the site promoted by Linden can be developed without leading neighbouring towns (or villages) merging into one another.</td>
</tr>
<tr>
<td>To assist in safeguarding the</td>
<td>Assists in safeguarding the</td>
<td>As with other parcels identified in the Study which adjoin a settlement, development to the west of Flexford in Parcel H15 would result in development in the countryside. However the</td>
</tr>
<tr>
<td>countryside from encroachment</td>
<td>countryside from encroachment</td>
<td>site promoted by Linden can be accommodated without leading to the unrestricted sprawl or large built-up areas and without leading to neighbouring towns (or villages) merging into one another.</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>To preserve the setting and special character of historic towns</td>
<td>Does not preserve the setting and special character of an historic town</td>
<td>We agree with the conclusions in this regard</td>
</tr>
</tbody>
</table>

As the table above demonstrates, an assessment of the site promoted by Linden indicates that it makes a reduced contribution to the purposes of the Green Belt than the large Parcel H15.

Volume 2 of the Study highlights flaws in the assessment of the Green Belt parcels. For example a parcel which adjoins a settlement such as Parcel H15 is assessed as checking the sprawl of a built-up area and as safeguarding the countryside from encroachment. In contrast, Parcel H4 which does not adjoin a settlement is not said to check the built-up area of a settlement or to safeguard the countryside from encroachment. It cannot be a sound approach that areas physically separated from sustainable settlements are assessed as playing a lesser role against the purposes of the Green Belt and such an approach runs the risk of failing to support the delivery of sustainable patterns of development.

Volume 3 of the Study relates to ‘Land surrounding the Villages across the Borough’. Part of the site promoted by Linden is identified in Volume 3 of the Study as H15-A and in assessing potential development areas around Flexford the Study states that:

“H15-A is surrounded by defensible boundaries including treecover and residential garden boundaries on Beech Lane to the north, residential gardens on Westwood Lane to the east, hedgerows near residential properties on Green Lane East to the south, and hedgerows within open farmland to the west of the PDA.”

Although the site promoted by Linden is larger than the potential development area (H15-A) identified in the Study, it is considered that the conclusions apply to each area given the nature of the land and its surroundings to the west of Flexford.

Volume 4 of the Study considers insetting villages from the Green Belt and the definition of new Green Belt boundaries in the Borough. Volume 4 concluded that Flexford to the south of the railway should be inset from the Green Belt due to:

- The difference in open character to the north and south of the railway line, with high density development and enclosure more evident to south of the railway line in comparison to the north;
- The high density residential development located on Christmas Pie Avenue, Orchard Way, Cull’s Road, Flexford Road and Westwood Lane to the south of the railway line; and
- The presence of recognisable and defensible boundaries to the south of the railway line including treebelts to the east of The Paddocks, Crossways and Flexford Road, the hedgerows and newly planted woodland to the south of Flexford Road, and fencelines, hedgerows and treebelts to the west of Westwood Lane.

Volume 5 of the Study sets out a list of 10 settlements (or combinations of settlements) at paragraph 21.1 which have been assessed for potential major expansion. The list includes “Normandy and Flexford”. Paragraph 21.47 of Volume 5 identifies that Normandy and Flexford had a population of 1,784 and was 10th in the sustainability ranking.

Volume 5 of the Study appears to indicate that a Potential Major Development Area between Normandy and Flexford may be appropriate (site H12-A). However, Volume 5 does not appear to consider the alternatives to the large scale Potential Major Development Area between Normandy and Flexford, for example the opportunities presented by sites such as H15-A which forms part of the site now promoted by Linden. This is particularly concerning as Volume 5
identifies concerns about the Potential Major Development Area between Normandy and Flexford for Green Belt reasons (such as detracting from the openness of the surroundings and greater settlement coalescence).

There does not appear to be any assessment, undertaken between Volumes 3 and 5 of the Study to identify why site H15-A (or any other sites at Flexford other than H12-A) was not assessed further. This is of particular concern given that the Study identifies the settlement as a sustainable location Linden reserves the opportunity to comment on such evidence should this be made available. As far as we can establish, the Study presents a series of potential areas at Flexford for development in Volume 3, then in Volume 4 concludes that the settlement should be inset from the Green Belt and in Volume 5 considers the opportunities for a Potential Major Development Area between Normandy and Flexford, but without explaining why the other opportunities had not been pursued.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/656</th>
<th>Respondent: 17463841 / The Earl of Onslow and the Trustees of the Clandon Estate</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base</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>
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<tr>
<td>Sustainability Appraisal</td>
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<tr>
<td>2.60 We note the sustainability appraisal has been updated as part of the current consultation. However, of the options and scenarios tested, although a number support the inclusion of Onslow Park, the way the options are construed does not reflect the level of housing need we consider should be provided and in addition are structured in such a way as to not allow for the proper consideration of Onslow Park as an alternative to one or more of the proposed sites which are considered simply as part of the baseline. The study also assumes a generally increasing level of impact pro-rata to the level of development proposed. This is not likely to be the case as sites in less sustainable locations or which impact on national or international level sites and designation will by definition have a greater impact and be less sustainable.</td>
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<tr>
<td>2.61 The assessment also fails to properly reflect the beneficial effect of locating development close to the urban area, where mixed use development can contribute in broad terms to economic, social and environmental infrastructure and achieve a wider public benefit.</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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<table>
<thead>
<tr>
<th>Comment ID: pslp173/405</th>
<th>Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulson</th>
<th>Agent: Vail Williams LLP (Jane Terry)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base</td>
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<tr>
<td>Air Quality Assessment</td>
<td></td>
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<tr>
<td>This document considers the potential effect of the growth proposed in the Local Plan on air quality. Specifically in relation to Ash and Tongham, the report concludes that changes in traffic flows will not lead to an exceedance of the air quality objective. It is therefore confirmed that Air Quality is not a prohibiting factor in bringing forward development in</td>
<td></td>
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</tbody>
</table>
this area. Nevertheless, the report recommends that the findings of the air quality review undertaken to inform the Draft Local Plan should be confirmed by individual developments as part of the planning application process. This precautionary approach which ensures that these issues will be considered and addressed at the detailed design stage is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**APPENDIX D: EVIDENCE BASE - RESEARCH**

**Air Quality Assessment**

This document considers the potential effect of the growth proposed in the Local Plan on air quality. Specifically in relation to Ash and Tongham, the report concludes that changes in traffic flows will not lead to an exceedance of the air quality objective. It is therefore confirmed that Air Quality is not a prohibiting factor in bringing forward development in this area. Nevertheless, the report recommends that the findings of the air quality review undertaken to inform the Draft Local Plan should be confirmed by individual developments as part of the planning application process. This precautionary approach which ensures that these issues will be considered and addressed at the detailed design stage is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Air Quality Assessment

6.1 This document considers the potential effect of the growth proposed in the Local Plan on air quality. Specifically in relation to the North East of the Borough, the report concludes that changes in traffic flows will not lead to an exceedance of the air quality objective set out in DMRB Guidance (Highways Agency, 2007). It is therefore confirmed that Air Quality is not a prohibiting factor in bringing forward development in this area. Nevertheless, the report recommends that the findings of the air quality review undertaken to inform the Draft Local Plan should be confirmed by individual developments as part of the planning application process. This precautionary approach which ensures that these issues will be considered and addressed at the detailed design stage is supported.

Local Housing Needs Surveys

6.2 This document confirms at page 342 that ‘There are currently Local Housing Needs Surveys for…West Horsley’. We support the preparation of the updated local housing need study, however, we reserve the right to comment on the outcome detail in due course and as part of any examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 1726.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Appendix E - Superseded Policies
APPENDIX E – Superseded Policies

The new paragraphs above the table are very welcome and helpful. This Appendix will help bridge the gap until the second part of the local plan – The Development Management Local Plan – is brought forward and adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Saved but not superseded 2003 Plan policies

Paragraph 1.3 of the ‘Proposed Submission Local Plan: strategy and sites’ states that the Plan contains overarching planning policies. Appendix E of the Plan lists the policies and against most of them gives corresponding policies in the 2003 Plan. It is thus clear that the policies listed in Appendix E are the overarching policies, and that they will supersede the given corresponding policies in the 2003 Plan.

What is not so clear is the fate of the 2003 policies which are not superseded. Paragraph 1.3 referred to above states that the Submission Local Plan will be followed by the ‘Local Plan: Development Management Policies’, which will include detailed development control policies. It does not relate these policies to the 2003 policies which are not superseded.

It is not clear that all the ‘saved’ 2003 policies which are not superseded will be covered by policies in the ’Development Management Policies’?

Some help is given by Appendix 1 of the ‘Guildford Local Development Scheme 2015’, which is given on the 'New Local Plan’ page of the GBC website. The Appendix 1 states: “The Local Plan: strategy and sites will include a list of the extant Local Plan policies identifying which policies are to be replaced by the Local Plan: strategy and sites DPD and which will continue to be applied alongside the Local Plan: strategy and sites DPD”. Unfortunately the Proposed Submission Local Plan’ does not give a list of all the extant 2003 Local Plan policies and does not identify the 2003 policies which will continue to be applied alongside the ‘Local Plan: strategy and sites’. Thus there is a double inconsistency between the current LDS and the Executive draft Plan.

This inconsistency should be removed. The neatest way of doing this may be for the new Plan to have a further Appendix giving the 2003 policies which have been saved but not superseded and a note they will be included in the ’Development Management Policies’. The above Appendix 1 states that the ‘Management Policies’ ‘will supersede any remaining policies in the Local Plan 2003’. The remaining ones are presumably those which have been saved but not superseded.

This matter is important because decisions by Councillors and Officers on planning applications are usually justified by reference to specific planning policies. I would like to be able to cross check that in this regard the strengths of the 2003 Plan have been carried through to the new Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4530</th>
<th>Respondent: 8605889 / Surrey County Council (Sue Janota)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix E: Superseded policies</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>is Sound?</td>
<td>is Legally Compliant?</td>
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<td>( )</td>
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</tbody>
</table>

Policy M8 (The Guildford to Cranleigh Movement Corridor) of the existing 2003 Local Plan safeguards the route of the former Cranleigh railway line. While there is little likelihood of this corridor being required for a major alternative piece of infrastructure, such as a light railway, it is nonetheless a vital facility for cyclists and walkers and will continue to serve that function. Its general quality will need to be maintained and improved where possible, so for this reason it should continue to be safeguarded as a corridor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/111</th>
<th>Respondent: 11051521 / J and M Baylis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix E: Superseded policies</td>
<td></td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>( )</td>
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</tr>
</tbody>
</table>

The new paragraphs above the Table are very welcome.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Appendix F - Policies Overview Map
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPA16/4319  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Across the Borough as a whole under the Reg19 Consultation plan, there are several strategic sites (shaded in red on the plan below):

<see attachments for complete document>

These sites effectively form a broken chain of developments (whether urban extensions, village extensions or new settlements) as highlighted below at Figure 5.

The constraints imposed on the Borough through national and European Union guidelines, directives, laws and regulations such as Special Protections Areas (Thames Basin SPA) and Areas of Outstanding Natural Beauty (Surrey Hills AONB) serve to squeeze development allocations into a narrow corridor of largely disconnected settlements.

To the north east of Guildford, the sites are strung along the ribbon of the A3 – a failing part of the Strategic Highway Network – and to the west of Guildford, the sites sit largely between the A323 and the A31 – mostly with impaired access to either or both.

These constraints are unlikely to ease substantially during the plan period and, particularly the AONB, can be expected to endure into the next plan period. It is almost inevitable, following the logic of the site allocations in the Reg19 Consultation plan, that this chain will be further developed in subsequent plan periods.

In Figure 5 below, the blue dots show the broken chain between the strategic sites.

In Figure 6 below, the threat to the 5.1km rural gap between the conurbation of Aldershot (including the Ash & Tongham Urban Area), as extended to the east, and Guildford as extended to the west is plain to see.

Figures 4 & 5 show the future vulnerability to coalescence of settlements in the north eastern sector.

The Local Plan must provide for future development and it must regulate for the long term protection of the Green Belt boundaries to preserve the openness and prevent coalescence.

The allocation of sites currently in the Green Belt for development must not fly in the face of the fifth purpose of the Green Belt (to encourage regeneration of brownfield sites). Figure 7 below shows the strategic town centre sites that are allocated in the Reg19 Consultation plan.

The land allocated for development must be used better – Guildford cannot afford sprawling (garden village) developments that use a lot of land. The density of developments needs to be such that:

11.1. Allocated land is not wasted;
11.2. Development creates or enhances sustainable communities;
11.3. The developments must not create or aggravate imbalances within existing communities;
11.4. Densities and quantities of development are such that public transport can be provided efficiently;

On the other hand, Guildford needs to understand how to preserve key views, restrict height of developments to ensure strong and interesting rooflines, and to recognise the key landscape characteristics of the town and its surroundings.

Allocations of land are likely to be required within two local plan periods and suitable safeguards need to be put in place to ensure that sites are released and consented in such a way as to ensure that urban area regeneration can take place to resolve relative deprivation issues in many parts of the Borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 20160717_GSOC_Response_to_ConsultationDraftReg19LocalPlan_FINAL.pdf (4.2 MB)

Comment ID: PSLPA16/3306  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The opening statement from the Leader of the Council reflects what most people in my constituency feel - that Guildford is a very special, beautiful place. Many of my constituents would also support: the desire to enhance and protect our natural and built environment; homes they can afford either to rent or buy; a good and vibrant jobs market; improvement in transport across the borough through increased travel options; preservation of our open spaces; enhancement of the river frontage in our town centre; and viable local shops. I would also highlight the importance of the Areas of Outstanding Natural Beauty, the Green Belt, the Thames Basin Heaths Special Protection Areas and also some of our undesignated countryside which enhance people's lives. This is consistently recognised in the correspondence I receive although this is outweighed by the number of people who write to me because they find it impossible to find a home to rent or to buy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Each of these objections relates to each of the sites in the Green Belt.

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Attached documents:

Comment ID: PSLPA16/3256  Respondent: 8826369 / Tim Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

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Attached documents:

Comment ID: PSLPA16/2669  Respondent: 8828545 / Anjali Mittal  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

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Comment ID: PSLPA16/3872  Respondent: 8839041 / Jon Maslin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

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The maps have different ratios which can be rather misleading in terms of comparing one with another.

The map for Compton suggests that the dotted pink line is the boundary line for the village when in fact this is just the village settlement area. The wider village includes Priorsfield Road and The Avenue and Down Lane and parts of New Pond Road and the Hog’s Back and Blackwell Farm, all of which are missing. Common land should ideally be marked up. Blackwell Farm is currently shown on a map called ‘Guildford Urban’ which of course does not exist and hence this could be misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3197  Respondent: 8840449 / David Wilson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policies A1 to A57: Site allocations

17.1. For the reasons stated previously I OBJECT completely to Site allocations A35, A38, A41

17.2. I also OBJECT to the total volume of proposed houses if you add together all the following proposals: A35, A36, A37, A38, A39, A40, A41, A42. This total volume is far too high in relation to existing numbers of houses in these rural villages. The increase in West Horsley alone will be 35% which is quite disproportionate compared with other areas of the Borough. Furthermore, the density of housing proposed is far too high and far higher than existing in these villages.
17.3. The proposals for Wisley (A35) will create a mega village that will then soon (when combined with the other proposed building in East & West Horsley) mean that these and other nearby rural villages are lost altogether into a new amorphous mass of tarmac and houses. PRESERVE THE GREENBELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2510  Respondent: 8858881 / Stephen Meredith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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3. Having determined housing need the Council was should have considered constraints before determining the housing number including the scarcity of sites outside the Green Belt and infrastructure (particularly roads).

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Comment ID: PSLPA16/2733  Respondent: 8865537 / P Waldner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

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At a more local level, as a resident of East Horsley, I object especially to residential development proposals contained in policies: A35, A37, A38, A39, & A40 on the basis that the proposed development is excessive (particularly on the Wisley airfield site and in West Horsley) and far exceeds local need for new housing at any level. The proposals would irreparably damage the rural feel of the villages and form a small town – but with no opportunity for commensurate extension of infrastructure and development of necessary supporting facilities (or employment opportunities). This makes the proposals unsustainable – without adequate provision for wastewater capacity and runoff, local schools, road capacity and flood prevention.

The developments would create isolated urban developments with none of the benefits of urban living and destroy the rural community. The proposed housing density is excessive when compared with existing development in the villages and the new developments would not blend with the existing developments.

The draft Plan fails to address the collective and hugely destructive impact of these sites on a small part of the borough which lacks the infrastructure (particularly transport) to support them. It is disappointing to note that the total amount of new building is totally out of scale with the planned development elsewhere in the borough, especially less sensitive urban areas which are not protected by Green Belt.

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I strongly object to the creation of a ribbon of development along the route of the A3/A31.

Observation of the map published in the draft Local Plan makes it abundantly obvious that ribbon development is about become a reality. Starting in the east at the former Three Farms Meadows (Wisley Airfield) 2,000+ houses on the south of the A3; approximately 2 miles to the west, Garlick’s Arch, another 400 houses plus 7,000 sq m of industrial units on the...
north side of the A3; another 2 miles further west, at Gosden Hill Farm, 2,000 houses plus a park and ride on the south of the A3 adjoining the large housing estate created when Burpham Sainsburys was built. Then another 2 miles to the west on the north of the A31, 1,800 houses at Blackwell Farm and an extension to the Science Park; and then in Normandy 1,000 houses and a school. What is this if not urban sprawl, ribbon development and merging of settlements?

I also understand that a “feeder” road will be built parallel to the A3 because of the high volume of traffic expected by the housing created in the east of the Borough. This is being suggested to remove any need for traffic generated by the Gosden Hill development and the proposed park and ride facility to use small local Guildford roads to access the A3. Much of the land that this feeder road will cross is already owned by a property developer and it is inconceivable that the developer will not apply for planning permission to put housing/industrial units along this feeder road at some later date. Merging of Burpham and Send would then be complete.

Our Green Belt is precious and each time a small part is developed it eats away at the Green Belt as a whole, and in time we will have none left. Once that happens the Green Belt is gone forever and it will be too late to lament its loss.

Can Guild Borough Council take responsibility for such a loss of the Green Belt and the fact that we will have almost continuous development along the A3 from central London?

How does Guildford Borough Council explain that their draft Local Plan is not following NPPF guidelines?

How does Guildford Borough Council think removing villages from the Green Belt preserves the setting and special character of our historic towns and villages?

Guildford Borough Council is expected to follow the rules laid down in the NPPF about Green Belt. It has not.

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4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.
supported by credible, well-qualified alternative assessments. In particular the reports produced by Neil McDonald Strategic Solutions in both 2016 and 2017 demonstrate that the SHMA assessments of the objectively assessed housing need (OAN) have been considerably over-stated, mainly because of:

a) The particular circumstances of Guildford being a modest-sized town hosting a large university and other further education colleges with a correspondingly large population of students, and

b) Errors in the assessment of the housing need arising from economic growth.

Planning Practice Guidance paragraph: 005 Reference ID: 2a-005-20140306 makes it clear that where appropriate Local Planning Authorities may depart from the standard methodology for deriving the OAN, and Guildford’s circumstances certainly justify that approach. I therefore object to these Allocations on the grounds that the OAN assessment is faulty.

1. Moreover, paragraph: 004 Reference ID: 2a-004-20140306 of the Guidance states that “The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.” Policy S2 is a specific policy of the Local Plan in which constraints have not been applied, and I therefore object to these Allocations on the grounds that no constraints have been applied.

2. Finally, I attach a copy of ministerial advice in two separate letters from Nick Boles MP, Parliamentary Under Secretary of State (Planning), which made it clear that “Student housing makes a significant contribution towards housing supply by taking pressure off demands on housing stock. This Government has clarified guidelines to make it clear that local authorities can include student housing in the calculation of, and the monitoring against, local housing needs regardless of whether they communal or sited on a university campus.” I have found nothing in the SHMA or the draft Local Plan that indicates that the proposed housing number was calculated after taking full account of the proposed scale of new student accommodation. Therefore I object to these Allocations on the grounds that the final housing number has been calculated incorrectly.

3. In addition to the comments above that are based on fundamental problems in the assessment of the OAN (ie. unreliable calculations and the failure to account properly for student accommodation) and the failure to apply constraints, I have a further specific objection to A25 (Gosden Hill Farm) as a result of considering it in conjunction with Policies A43 (Garlick’s Arch) and A58 (land around Burnt Common Warehouse). Together these three Allocated Sites form two miles of almost continuous dense development alongside the A3 trunk road, with a short break of just 700 yards separating A25 from A58. Moreover, A25 is itself adjacent to Burpham which is already part of the existing Guildford conurbation. NPPF paragraph 79 states that “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”, and paragraph 80 states that the first of the five defined purposes of the Green Belt is “to check the unrestricted sprawl of large built-up areas”. Sprawl is exactly what these three Policies, taken together achieve.

The joint impacts of these three Policies are fundamentally at odds with the provisions of NPPF, and with the many ministerial statements concerning the importance of the Green Belt – in particular its openness and its permanence. I therefore strongly object to Policy A25.

1. Furthermore, in addition to the comments above that are based on fundamental problems in the assessment of the OAN (ie. unreliable calculations and the failure to account properly for student accommodation) and the failure to apply constraints, I have a further specific objection to A35 (former Wisley Airfield). The new text in paragraph 4.6.20 states that “The NPPF requires that developments that generate significant movement will be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. It also states that different policies and measures will be required in different communities and that opportunities to maximise sustainable transport solutions will vary from urban to rural areas. Our spatial development strategy addresses the development needs of the borough and where that development should be focused, actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling, and
focusing significant development in locations which are or can be made sustainable. Achieving sustainable transport has been a key consideration in setting the spatial development strategy.”

Given that as an approach, it is difficult to see how A35 ever managed to survive in this draft of the Local Plan, as the reality is that travel from that proposed settlement would be highly unsustainable – the overwhelming majority of journeys would inevitably be by car. **I therefore strongly object to Policy A35.**

1. Quite apart from the above five fundamental objection, there are dozens of further objections when the detailed circumstances of each site are considered, eg. effects on traffic; sustainability; infrastructure; impact on the AONB; air and noise pollution; nitrogen deposition. **I wish to register each of these as additional objections.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/2728  **Respondent:** 10757185 / Liz George  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to :-

Send village being removed from the green belt

400 houses and industrial space at Garlicks Arch

45 houses at Clockburn Nursery

40 houses and two travellers pitches at Send Hill New interchange at A3 at Burnt Common Send road is already overloaded with traffic, it will become gridlocked increasing noise and pollution levels even further.

Proper use of Brownfield sites ie Slyfield mean that this green belt area is not needed Plans for 64 apartments and a Marina are already in place A smaller plan for under 50 properties in total should be considered with other villages throughout the Borough accepting similar proposals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2938  **Respondent:** 10765249 / Andy & Sonja Freebody  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site
justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may well conclude that the consultation has not been properly conducted. The Council should also consider the impact that objections (which will inevitably be made) on any planning applications on these sites will have on its capacity to deal with planning matters.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2145  Respondent: 10785633 / Penelope Eagle  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

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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:** PSLPA16/2936  **Respondent:** 10816993 / Jane Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

**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:
Maps

The maps have different ratios which can be rather misleading in terms of comparing one with another.

The map for Compton suggests that the dotted pink line is the boundary line for the village when in fact this is just the village settlement area. The wider village includes Priorsfield Road and The Avenue and Down Lane and parts of New Pond Road and the Hog's Back and Blackwell Farm, all of which are missing. Common land should ideally be marked up. Blackwell Farm is currently shown on a map called 'Guildford Urban' which of course does not exist and hence this could be misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3305  Respondent: 10890177 / Cheryl Burnside  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

SITES - POLICIES A1 TO A57

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3006  Respondent: 10918273 / Katharine Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1/ I OBJECT to Send Village being removed from the green belt. This was intended to be permanent as required by the National Planning Policy Framework. There is No special reasons why this should be abandoned. Green belt is an essential buffer stopping Woking and Guildford becoming one location. Local government gave a very clear election promise to protect the green belt and this contravenes that completely. This land cannot be developed on and lost forever.

2/ I OBJECT to building 45 houses at Clockbarn Nursery. Access is inadequate and traffic issues will arise in surrounding roads including Tannery Lane which is far too narrow and twisty to take any more traffic. The junction with Send Road is already very dangerous for vehicles trying to join the main road and permission has previously been given for apartments at the tannery and for building at the marina both of which will generate further heavy traffic. These roads can not take any more and the junctions is already dangerous so please do not allow this site to be developed.

3/ I OBJECT to building 400 houses and 7000 m² of industrial space at garlics arch. The site floods significantly and is covered by ancient woodland and industrial space is not required in the vicinity where there is plenty nearby at Slyfield. Guildford's housing requirements have been shown to be exaggerated significantly and they have refused to disclose their calculations. 400 houses will have major impact to Send and Ripley and the infrastructure cannot simply cope with a development of this size. We are already ping-ponged out to any secondary school in the county, need to plan to be ill to get an appointment at the Drs etc etc! It's too big and must be removed from the local plan. This was also sneaked in at the last minute from a proposal all of 100 houses which is still too many on such valued ancient land.

4/ I OBJECT to the development of 40 houses and two travellers pitches at this site in Send Hill. It is a completely inappropriate location because the narrow single width access to the country road provides insufficient access and would be very dangerous. This is an extremely busy road especially in the early morning with many parents taking their children through this route to send school. This immediate area also sees extra traffic when the A3 is heavy with northbound traffic or in ever increasing cases of road closure due to accidents! It is a beautiful site which was previously a landfill site and for this reason alone it should not be built on. This site has been refused before for the above reasons and I urge you to remove this from the local plan.

5/ I OBJECT to a new interchange with the A3 at burnt common because Send would have to take the traffic from proposed developments at Wisley Airfield, Gosden Hill, Burpham and Blackwell Farm. This totals over 4800 houses. Traffic from these developments would use this new interchange creating gridlock in the villages. It can already take 15-20 minutes to drive from Send School to the A3 northbound!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2995  Respondent: 10920801 / Andrew Roach  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
The local plan also proposes the development of Clockbarn Nursery and Garlick’s Arch. The additional traffic congestion and demand for additional school places will pose significant demand on already stretched local services and further undermine the quality of life that the current residents enjoy. I particularly object to the proposal for 40 houses and traveller’s pitches at Send Hill. The road access and local services are not sufficient and would be a blight on the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/2721</th>
<th>Respondent: 10923297 / Matthew Burnham</th>
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I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:

- Amount of new housing far exceeds local need.
- Housing density excessive when compared with existing development.
- Would transform the Horsleys into a sizable town, something for which no case is made.
- No local support.
- Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- No account taken of additional impact of Wisley Airfield site on Horsleys.
- Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.
- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
- Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera's new “Theatre in the Woods”.
- Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
- Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

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Attached documents:

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1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data
• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
• Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

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 of these are 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:** PSLPA16/2126  **Respondent:** 10928737 / Guy Pashley  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3108  **Respondent:** 10928929 / P C Cooper  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the 2016 draft local plan for the following reasons and would like my comments to be seen by the inspector:

I object to Send, Ripley and the surrounding villages being removed from the Green Belt. Our MP promised to protect the Green Belt yet the local plan is proposing to remove 15 villages from the Green Belt, this is unacceptable.

I object to the plans for Garlicks Arch. Our infrastructure is already struggling with the current occupancy in the area. Our roads are regularly gridlocked, particularly Send Road and Send Marsh Road with the flow of traffic onto the A3, which would only increase with an extra 400 houses and services to the proposed industrial units. Services such as the local schools and doctors are already at full capacity, with it being increasingly difficult to get a doctors appointment even for young children. This issue would only amplify with the proposed developments. Our roads and pavements are already in a state of disrepair and an increase of pedestrians and vehicles will only make this matter worse.

I object to the proposed A43a on/off ramp at Burnt Common as again this will only increase the quantity of traffic in the area, which is already struggling.

I object to the disproportionate amount of development in one area of the borough, our villages will lose their identities and blend into one.

I object to the inclusion of 2 travellers pitches at Send Hill, I can not understand why this would benefit our village and why any borough would actively encourage these pitches.

I object to the way in which many items of the local plan have been introduced. I do not believe Guildford Borough Council have followed correct process by introducing last minute additions and alterations which warrant a full consultation period not the short cut that it appears to be.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2600  **Respondent:** 10932801 / Angela Grenham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all policies which involve building on the Green Belt:

- No exceptional circumstances are shown, numbers are excessive and the clearly expressed views of residents in previous consultations ignored.

I object especially to policies A35-41:

- Amount of new housing far exceeds local need
- Housing density excessive when compared with existing development
- Would transform the Horsleys into a sizable town, something for which no case is made, and would cause significant detriment to neighbouring villages
- No local support
- Collective impact of these 6 sites on a small part of the borough appears not to have been considered
- Key infrastructure is lacking with no adequate provision
- Green Belt gap with neighbouring settlements hugely narrowed
- Site A35 has surely been included in error given that it has recently been rejected by the Planning Committee?
The Local Plan will shape the future of our historic villages and our borough. Please listen to the views of the residents.
I would be pleased to see a revision to the Local Plan which preserves the Green Belt and results in proportionate
development on suitable sites, enabled by infrastructure improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2964  Respondent: 10941697 / Adrian and Tina Curtis Wylde  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send Village being removed from the Green Belt as the original purpose of this concept, to inhibit the spread of the suburbs in to rural and semi-rural areas, is as valid as it was when it was conceived. There are no special circumstances to justify abandoning it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2191  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Proposed Submission Local Plan - Site Policy A35, A36, A38, A39, A40, A41

My wife and I are resident at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

The B 2039 Ockham Road North/South is already being used like an A road! The structure of the road is not suitable for the current volume of cars, heavy goods vehicles and coaches which has increased dramatically since we arrived here in 2017. If 500+ new houses are built in the Horsleys alone the result will be unbearable. If the so called Wisley Airfield plan was also allowed the result would be absolute chaos.

Our local schools, the Horsley Medical Centre, the Horsley railway station car park and the parking facilities at the 2 shopping areas are already operating at maximum capacity.

There do not appear to be any proposals which would address these problems.

The inclusion of these sites in the proposed local plan is therefore contrary to Policy 13 (Suitable Transport for new developments) and Policy 11 (Infrastructure and Delivery).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

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 of these are 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.

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2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/2534  **Respondent:** 10998081 / David Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

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:** PSLPA16/2722  **Respondent:** 10999169 / Rebekah Fowler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: I object to the 2016 draft local plan for proposed building on Green Belt land in Send, Send Marsh and Ripley.

My mother, with whom I live, and my late father moved to Send Marsh in 1965 when I was two years old, indeed, walking up Greyfriars Road holding my mother’s hand towards our new home is my earliest memory. Along with my two
elder sisters and my younger sister, born in The Sheiling in 1966, we have enjoyed and truly been blessed with our parents’ forethought and aspiration of bringing up their four daughters in a rural, Green Belted community.

My sisters and I went to schools in Send, sang in the choir in Send Church, and went to Brownies and Guides in Send, Adventure Scouts in Ripley and attended many other activities in our local community. We are of course full grown now; however, The Sheiling in Send Marsh is still our family home and we care deeply, not only about our mother’s immediate environment, but for the local community too. The proposed building plans are simply unsustainable on many levels, eg:

- Lack of transport/road infrastructure - hugely increased traffic on already creaking roads
- Lack of amenities, eg, doctors’ surgery places, dental practices, hospitals, etc
- Lack of sufficient schools/nursery facilities to accommodate such a rise in populace
- Increased suburban noise levels (the A3 is already a constant drone 24 hours a day)
- The rise in populace will inevitably dilute the community spirit of the area

My mother, and subsequently I, has chosen specifically to live in a Green Belted, rural community. These proposed plans are not only unsustainable logistically and environmentally – they are in fact a gross infringement of the local community’s rights and freedoms.

I appreciate that we are living in a country whose population is ever increasing; however, Surrey is the most densely populated county outside of Greater London, so surely a better holistic view of the country’s needs should be to be taken into account before destroying Send Marsh, Send and Ripley’s beautiful Green Belted community.

For all of the above reasons my specific objections are as follows:

- I object to Send, Send Marsh and Ripley Villages being removed from the Green Belt
- I object to building 400 houses and 7000 square metres of industrial space at Garlick’s Arch
  This site is covered by ancient woodland and the industrial space is not required and could be built at Slyfield. Guildford’s housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt site is not required.
- I object to building 45 houses at Clockbarn Nursery – particularly as permission has already been given for 64 apartments at The Tannery and for building a marina – all of which is unsustainable currently, let alone if more houses are built in the area
- I object to the development of 40 houses and two travellers’ sites at Send Hill
- I object to a new interchange with the A3 at Burnt Common
- I object to site A45 The Talbot
- I object to site A25 Gosden Hill Farm
- I object to site A35 Wisley Airfield
- I object to site A57 The Paddocks
- I object to the disproportionate amount of development in one area of the Borough
- I object to the lack of any evidence for the alleged housing need numbers

I request that my comments are shown to the Planning Inspector, and further request confirmation that you have received this communication. I look forward to hearing from you.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.1 I request a confirmation by email from GBC that all of the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

1.2 I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

1.3 Guildford is a constrained borough with nearly 90 percent of its area zoned as permanent Green Belt plus it has an out of date road network that is already at or beyond capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2233  Respondent: 11041153 / Melissa Ransome  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed development to site A25 Gosden Hill. Immense overdevelopment on Green Belt land.

I object to the proposed development to site A42 Cockbarn Nursery, Tannery Lane.

I object to the proposed development to site A35 Wisley Airfield. More unsustainable development on the Green Belt.

I object to the proposed development to site A44 Land West of Winds.

I object to the proposed development to site A45 The Talbot.

I object to the proposed development to site A57 The Paddocks of 4 Traveller pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2106  Respondent: 11071553 / Nicholas Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICIES A36, A37, A38, A39, A40 & A41 (EAST AND WEST HORSLEY) – I especially object on the following grounds:

- The volume of new housing far exceeds local need.

- The impact of these 6 sites on this neighbourhood has not been considered in aggregate. In terms of impact, they are not separate sites.

- The total amount of new building is out of proportion with overall planned development across the borough, and especially excessive when compared with urban areas. As a basic principle, most development under the plan should be in the least sensitive and protected areas.
- The housing density is too high compared with existing development.
- Taken together, these policies would transform the Horsleys into a town, something for which no case is made.
- There is no support locally for this.
- The sites are not sustainable since key infrastructure is lacking and no provision is being made to increase it - eg poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- The policies allow too many settlement boundaries to be extended. The Horsleys are irregularly shaped settlements. These policies allow too many boundaries to be squared off so that green fields can be concreted over on the spurious grounds that they don’t contribute to the Green Belt.
- These policies will damage compliance with NPPF 81 by making cycling too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the setting of Grange Park Opera’s new “Theatre in the Woods” etc.
- The Green Belt gap between the Horsleys and next-door settlements would be greatly narrowed, especially if the Wisley Airfield development is taken into account.
- No account is taken of the impact of Wisley Airfield site on the Horsleys.
- Safe access and egress at Site A40 unachievable, because of flooding, high speed limits, poor sight lines, narrow access to existing properties, the ditch running along the street, poor pavements for the elderly and schoolchildren and the road’s increasing use by recreational cyclists.
- Policy A40 is especially impractical because of high water table and poor drainage, causing regular winter flooding.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/4199  **Respondent:** 11763777 / AECOM (Philip Scott)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Land to the South of New Pond Road, Farncombe

The land to the South of New Pond Road was previously allocated for development via the Guildford Draft Local Plan Strategies and Sites document. The land covered by this previous allocation falls within different land ownerships. The western part of the allocation is being promoted by Countryside Properties (UK) Ltd. The eastern part of the allocation is being promoted by BlackOnyx Land Promotions Guildford Ltd. There are two residential properties within separate ownership at the centre of the previous allocation.

Countryside Properties and BlackOnyx are collaborating to bring forward the development of the land to the South of New Pond Road in a co-ordinated and comprehensive manner.

Although separate representations have been submitted, there is recognition of the need to take account of each other's proposals.

If the Borough Council are minded following the current round of consultation to reinstate the previous draft allocation at New Pond Road, we would confirm our intention to work together to ensure that the site is deliverable, ensuring that housing delivery through the plan-making process is achieved through a reliable supply of land for housing over the entirety of the plan period.
Countryside Properties and BlackOnyx will continue to co-operate in the delivery of the wider site and promote its identification as a residential allocation in the emerging Guildford 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: PSLPA16/2115  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:
• Amount of new housing far exceeds local need.
• Housing density excessive when compared with existing development.
• Would transform the Horsleys into a sizable town, something for which no case is made.
• No local support.
• Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
• Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
• Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
• No account taken of additional impact of Wisley Airfield site on Horsleys.
• Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.

6
• Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
• Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
• Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
• Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/446  Respondent: 15208417 / Colin Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
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<tr>
<td>10) I OBJECT TO the lack of evidence for the alleged housing need numbers</td>
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<td>2) Evidence</td>
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<td>GBC have failed to provide sound evidence in terms of the the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means the industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8,000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. 50% of new homes needed could be built on brownfield sites. GBC’s Transport Assessment was not even available to councillors for the vote taken on 24th May, being published on 6th June. Infrastructure overload has received scant attention.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

On a more general note, you should add the following reasons for objecting to all of the identified proposals;

1. The council has failed to plan and identify sufficient Brown Field sites to accommodate development.
2. I believe their decisions may have been influenced by potential developers anxious to maximise profitability at the detriment of local people.
3. The council's forecasts are unrealistic and unreliable.
4. Several areas are subject to flooding and the increased effects of climate change need to be taken into account.
5. Impact on local services - insufficient infrastructure eg local schools, already stretched medical services (one can wait 2 weeks for a non urgent appointment now), transport needs to be improved.
6. Huge increase in traffic and damage to the environments. Existing road networks unable to cope. Proposed additional access points to the A3 will only exacerbate problems.

7. The Green Belt must be protected. Government and Councilors gave election undertakings to preserve it, therefore the council are in breach of that undertaking. They should consult their constituents on such a significant matter which will undoubtedly effect us all.

8. If the Green Belt is removed - it will be deemed the go ahead for future development which could result in the urbanisation of our villages. Such destruction to our countryside is untenable. Once it starts it will be irreversible and permanent. I urge the councilors to think again. Surely, they do not wish to alienate the majority of villagers in Guildford borough? As I have yet to meet anybody who supports these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2075</th>
<th>Respondent: 15474849 / Timothy Yorath</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
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I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for " However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances " existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

1. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.
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<th>Comment ID: PSLPA16/2116</th>
<th>Respondent: 15478017 / Kirstie Pankhurst</th>
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<th>Respondent: 15478177 / Michelle Brown</th>
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4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data
• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
• Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016
• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

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 of these are 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: PSLPA16/2120  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

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1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
• Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

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 of these are 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: PSLPA16/2125  Respondent: 15478209 / Sally Daboo  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2139  Respondent: 15478785 / Alicia Grainger  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- The amount of new housing far exceeds local need. Houses already stay on the market for a while in the village, and the number of proposed houses is simply not needed.
- The housing density proposed is excessive when compared with existing developments. Part of the character of our village is that we are amongst green spaces and fields, and very much part of the countryside. Lose that, and you risk losing half the people who live in the village.
- The proposed size of development would transform the Horsleys into a town – which is not why people chose to live here. We chose to live here because of its rural character, and the case has not been made for the number of houses. Where are the calculations that support the proposals?
- There is simply no local support for the size of development. The collected impact of the 6 sites has not been considered – they should not be treated as isolated, separate sites, when in reality residents travel through these areas every day.
- The infrastructure will not support the proposed development – there is already poor wastewater capacity, lack of school places, absence of traffic management plans, flooding etc. and there is no adequate plans to increase it.
- The plans will harm compliance with NPPF 81 for example by making cycling (a key character of the village), and races such as the Prudential Ride London too dangerous, ruining the rural setting of Waterloo Farm campsite, and destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.

Page 49 of 63
• Policy A40 is especially unviable because of high water table and poor drainage, which will lead to regular winter flooding. We already have numerous occasions during winter when we have to travel on different roads because of flooding.
• The safe access at Site A40 is unachievable. There is already high speed limits, poor sight lines, narrow access to existing properties and inadequate pavements for the elderly and school children.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2162  Respondent: 15481281 / Simon Tolchard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object especially to policies A35-41:
• Amount of new housing far exceeds local need
• Housing density excessive when compared with existing development
• Would transform the Horsleys into a sizable town, something for which no case is made
• No local support
• Collective impact of these 6 sites on a small part of the borough appears not to have been considered
• Key infrastructure is lacking with no adequate provision
• Green Belt gap with neighbouring settlements hugely narrowed
• Site A35 has surely been included in error given that it was rejected by the Planning Committee?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2193  Respondent: 15481409 / Amy F Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2536  Respondent: 15504001 / Margaret Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

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: PSLPA16/2734  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

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?
I OBJECT SPECIFICALLY TO POLICIES: A36, A37, A38, A39, A40 & A41:

- Amount of new housing far exceeds local need. • Housing density excessive when compared with existing development.
- Would transform the Horsleys into a sizable town, something for which no case is made.
- No local support.
- Collective impact of these 6 sites on a small part of the borough not considered. Should not just be treated as isolated, separate sites.
- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding. • No account taken of additional impact of Wisley Airfield site on Horsleys.
- Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”. 6
- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on. • Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
- Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding. • Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclers etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

SITES A36-A41. Sites in East and West Horsley - I OBJECT

- Inclusion of Sites A36-41 (East and West Horsley). Whatever their merits as individual development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the villages of East and West Horsley.
- Building 533 new houses on these 6 sites, plus at least another 90 on small sites, including those in designated conservation areas is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities in the green belt. There are no specific “exceptional circumstances” to warrant the inset of these villages.
The total number of homes in West Horsley will increase by 35%, (urban Ash and Tongham 16% and Guildford urban area only 11%) which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town centre itself.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. EXAMPLE - Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.

Surrey County Council have no plans to investigate the statement by Guildford Council’s Education Review which says “expansion options may need to be considered for primary” education in the Horsley area within the first 5 years of the plan.

The Raleigh School is already full and proposing to moved to one of the identified sites - causing years of disruption in and around the villages.

The private Glenesk and Cranmore schools are also at or near to full capacity.

The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with over 2,000 new homes only 2 miles away (see below).

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, these 6 sites are at complete odds with NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a “Theatre in the Woods” – making West Horsley the only village in Surrey with an opera house. By surrounding Waterloo Farm campsite with 120 new houses,

Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby.

Additional housing will add to several hazards along this stretch of road (site A40), including: Its use by pedestrians, especially children (using the Raleigh and Glenesk schools and catching school buses to Guildford and Howard of Effingham)

Site A37 is in a conservation area already and recent planning permission for a much smaller development on the same site was unanimously rejected by the planning committee on several grounds. This should be removed immediately from the local plan for exactly these specific reasons.

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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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2769</th>
<th>Respondent: 15572577 / Jennifer Ratnayaka</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
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</tbody>
</table>

I OBJECT to Send and Ripley villages being removed from the green belt. The green belt is really important for and once it is gone, it's gone. It's really important to me to protect our green belt and our countryside, it's so important to the environment and for visitors to the area. We really must protect it and minimise development in the area which cannot be undone. The national planning policy framework says that the green belt should be permanent. Local councillors gave clear election promise to protect it and this is because it is so important to those who live here and beyond.

I OBJECT to the development at Send Hill which would ruin the countryside in this area. The roads cannot take more traffic, the lanes are narrow and bendy and already take many fast and noisy cars, it wouldn't be suitable to have more homes here.

I OBJECT to the building of 400 houses and 7000 sq metres of industrial space at garlicks arch. Please use brown field sites before looking at destroying the ancient woodland here.

The above proposed developments could also cause big issues in terms of heightened flood risk and more dangerous roads. It's really important to me to protect our green belt. As a recent first time buyer I appreciate the struggle faced by many trying to buy their home but even through the toughest searches I always stood strong that the green belt MUST be
protected, that is the whole point of the green belt! If any exceptions are made they will kick start the motions for many more developers and there is no way to reverse the damage. Our countryside, trees and wildlife is what makes our area so special.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2846  **Respondent:** 15576577 / Myra Rickard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I strongly object to GBC believing that it is ok to use our valuable green belt areas for building.

The A3 is a dangerous and busy road and GBC want to increase that danger and volume of traffic, how will that help the residents

The pollution is bad enough already – how will removing green belt and increasing traffic and household refuse help that?

What considerations have been made with regard to our wildlife?

There are no train links, so people travelling to work will need to drive – how will that help the unacceptable traffic congestion the locals already have to suffer.

Getting a doctor or hospital appointment is already hard enough, how will bringing tens of thousands of people into the area help

Is Green Belt, Green Belt or not? It is the duty of GBC to protect our environment, not bleed it away for the sake of greed. If GBC can’t do that then maybe they should not be employed on our behalf.

Turning our beautiful villages into just another urban sprawl is not acceptable

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2937  **Respondent:** 15581665 / Laura Daboo  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual
sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may well conclude that the consultation has not been properly conducted. The Council should also consider the impact that objections (which will inevitably be made) on any planning applications on these sites will have on its capacity to deal with planning matters.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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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:** PSLPA16/2974  **Respondent:** 15583169 / Poul Jensen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the impact on the greenbelt status of the villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3125  Respondent: 15586017 / C Maslin  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Maps

The maps have different ratios which can be rather misleading in terms of comparing one with another.

The map for Compton suggests that the dotted pink line is the boundary line for the village when in fact this is just the village settlement area. The wider village includes Priorsfield Road and The Avenue and Down Lane and parts of New Pond Road and the Hog’s Back and Blackwell Farm, all of which are missing. Common land should ideally be marked up. Blackwell Farm is currently shown on a map called ‘Guildford Urban’ which of course does not exist and hence this could be misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3116  Respondent: 15587073 / Mark Sweeting  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **Other infrastructure.**
   Is there adequate power, drainage and sewage provision for industrial development and is there sufficient school, medical and similar provisions for domestic expansion?

2. **Light and sound pollution.**
   The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society.
   It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds

   If included in the plan, provision should be made for strict control of noise and light pollution emanating from the site – particularly at nighttime.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3205  Respondent: 15588929 / Alex Hutchings  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

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<th>Comment ID: pslp173/344</th>
<th>Respondent: 17323713 / Obsidian Strategic (Philip Scott)</th>
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Land at New Pond Farm and Land South of Pond Farm Road (Site No. 80) is a sustainable and highly accessible site. An LVIA has been prepared which shows that the site does not contribute to the purposes of the Green Belt and its development would not harm or undermine the qualities of the Surrey Hills AONB. Accordingly the Green Belt boundary should be modified.

[text of attachment reproduced below]

We object to the absence of Pond Farm and Land South at Pond Farm Road (site no. 80) from the Proposed Submission Policies Maps contained in Appendix F.

Land at Pond Farm and Land South of Pond Farm Road is located to the immediate edge of Farncombe which is a sustainable settlement that benefits from a wide range of services, facilities and amenities including employment opportunities and excellent mainline rail connections (Guildford and London Waterloo) and a network of existing bus routes.
The Promotion Site is accessed via Furze Lane in an accessible location contiguous with the established urban form of the settlement. Furze Lane itself is well served by a bus services and a bus stop is located just 50 metres south of the Promotion Site entrance. The Promotion Site is contained within defensible strong boundaries which, notably, include the busy B3000 along the northern boundary and the mainline railway to the eastern boundary.

In light of the site boundaries and the adjacent urban context, GBC’s Green Belt & Countryside Study (Volume V) concluded that the Promotion Site does not contribute strongly towards the purposes of the Green Belt. Furthermore, the site does not contribute to the qualities and characteristics of the wider Surrey hills AONB (a point which has also been confirmed in the Surrey Hills AONB office comments to an approved residential planning application directly adjoining the Promotion site.

Two independent landscape reports (by Enplan and Barton Willmore) have considered site No. 80 (SHLAA site 1140 and SHLAA site 2241) for the respective site promoters and those reports also confirm that Site No. 80 does not contribute to the Green Belt purposes or the wider qualities of the surrey Hills AONB.

**Requested Modifications**

In all of the above respects, Land at Pond Farm and Land South of New Pond Road is ideally placed to deliver a sustainable high quality residential development including affordable housing during the front end of the Plan period. The PSLP should therefore be modified by allocating Site 80 for housing development and included the Promotion Site in the PSLP Part 2: Sites, and identified in Appendix F: Policies Map accordingly.

The PSLP seeks to deliver low and unambitious Annual Housing Target figures which will not meet the acute need for housing in the borough or meet the needs of neighbouring authorities or respond to inward migration from London. **The OAN should be increased accordingly to at least 693 dwellings per annum and Policy S2 modified accordingly.**

The PSLP’s Housing Strategy which weighs housing delivery to the back end of the Plan period (from 2026 onwards) will exacerbate housing need, lead to increased house prices and unaffordability, and lead to further increasing in housing waiting. The annualised Housing Delivery targets should be increased at the front end of the Plan period through the allocation of additional sites that are able to be delivered in the first five years of the Plan period. **The Annual Housing Target Table contained in Policy S2 should be modified accordingly.**

Land at Pond Farm and Land South of New Pond Road was identified in Volume V Section 17 of the Green Belt and Countryside Study (prepared in 2014). The Promotion Site was identified as area F6 which was then further divided into F6A and F6B. In the summary, the Report identified the range of significant defensible boundaries surrounding the wider site and concluded that site F6 B, ‘...provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt’. Additional technical assessments both conclude site No. 80 does not contribute to the purposes of including land within the Green Belt. **Site No. 80 should be removed from the Green Belt and the Green Belt boundary modified and identified accordingly in Appendix F: Policies Map.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

The Policies Map should be modified to illustrate Land at Pond Farm and Land South of New Pond Road (B3000). the Policies Map should also be modified to illustrate a re-defined Green Belt boundary which omits Land at Pond Farm and Land South of New Pond Road.

**Attached documents:**

- Enplan_Pond Farm and part Land South of New Pond Road LVIA 210717.pdf (12.7 MB)
- Pond Farm_Draft Regulation 19 Reps.docx (1.2 MB)
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Appendix G - Policy and monitoring
APPENDIX G – Policy and Monitoring

We have not cross-checked with the individual policies to establish whether these are complete and accurate, and where we have made comments about monitoring, these have been made in the sections on the policies themselves.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Following the Brexit Vote and substantial changes in the UK Government, we can expect a period of national economic and political uncertainty and change, and that this will impact on Local Plan Policies. For two obvious examples, there may be a period of financial retrenchment, and funding for works from Highways England, other grants and from developers, which will curtail or delay projected works. And there may well be a slow-up in immigration [tighter controls] and in the formation of new households [normally held to be dependent on rising incomes] which will reduce or alter demand for new houses.

It would now seem essential that the Local Plan establishes space for a series of deep, and in the early years frequent, reviews to assess what this impact might be and to make any necessary changes. The papers seem uncertain about this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am emailing to object to the Local Plan 2016, specifically as in the Policies Map Appendix F and Policy D4.
I do not believe that you have counted 2 detached houses on the plot which currently has only 1 - the plot being
at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions
of the Data Protection Act 1998] and owned by myself.

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: pslp173/112</th>
<th>Respondent: 11051521 / J and M Baylis</th>
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<td>New D4 very welcome, but there should be a positive indicator, with no target, such as number of new buildings achieving a national award for design.</td>
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Total records: 4.