

Policy 1 - Presumption in favour of sustainable development

We object to this policy.

Comment 1-1 - Paragraph 4 of this policy, which states, *“Planning applications that accord with the policies in this draft Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise,”* should be extended to include, not just Local Plan policies, but other Government/European policies, for example those set out in the National Planning Policy Framework (NPPF), the Habitats Directive etc. It should be noted that not all of the policies in this draft Local Plan accord with national policy, for example Policy 8 does not follow the National Planning Policy Guidance (NPPG) published on March 14, 2014 (see commentary below, under “Policy 8”).

Comment 1-2 - The section on monitoring indicators states that, as part of the Local Plan review, *“we will consider the appropriate level of new homes and employment land and examine all available evidence sources including demographic evidence, economic conditions and forecasts”*. We believe that this review should also include an assessment of local infrastructure and its ability to cope with development, and environmental impact assessment.

Comment 1-3 - The NPPF section 17 sets out a list of 12 principles that should underpin the process and decisions reached. At least half have not been fully implemented and communities are dissatisfied with the process and do not feel empowered - this has been borne out by a survey of Guildford parish councils and parish-based residents associations (See Appendix 1.)

Policy 2 - Borough-wide strategy

We object to this policy.

Comment 2-1 -The proposed housing supply figure (652 per annum) is more than double the current figure (322 per annum) and there is no evidence to show that this reflects Guildford’s housing need. The SHMA is a draft document, which is acknowledged to be based on inaccurate and out-of-date data and the methodology used to extrapolate the figure is flawed. The number is based on projections, rather than forecasts, and lacks intelligent analysis taking account of known anomalies. It has been rejected by the Council’s Scrutiny Committee, as well as by many residents groups and parish councils across the borough, and is not in line with the NPPF/NPPG.

Comment 2-2 - Para 4.3 states, *“Our development strategy for the plan period is based on national planning policy, with recognition of environmental constraints and the availability and viability of land for development.”* GBC has not fully applied the constraints of Green Belt and the AONB, which it is allowed to do, and instead appears to have sought a higher rate of development than is appropriate for the borough. It has been made clear in Ministerial statements that development on the Green Belt is at the discretion of local authorities, for

example:

“It has always been the case that a local authority could adjust a Green Belt boundary through review of the Local Plan. It must however always be transparently clear that it is the local authority itself which has chosen that path - and it is important that this is reflected in the drafting of Inspectors’ reports. The Secretary of State will consider exercising his statutory powers of intervention in Local Plans before they are adopted where a planning inspector has recommended a Green Belt review that is not supported by the local planning authority.” [Nick Boles, MP, to Sir Michael Pitt, March 3, 2014.]

Comment 2-3 - Para 4.6 states, *“Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need. We will therefore release allocated land for development in other areas.”* This is based on the premise that there is not enough brownfield land to accommodate the need within the timescales given and therefore Green Belt must be released. But whether there is enough brownfield land depends on the housing number, interpretation of constraints and the density of development. GBC seems to equate high density with undesirable environments. However, there is no connection between density and quality of environment. The quality of a built environment is only related to the quality of design and relationship with the surroundings. It is deficiencies in these two areas that make a development an undesirable place to be in. Redeveloping surface car parking (much of which is owned by GBC) would permit substantial areas of brownfield land to be developed, the costs of which could enable subterranean parking, where needed, or the addition of a multi-storey car park. As with all development, this would need to take account of flood risk and built accordingly, as has been done in other riverside developments.

Comment 2-4 - The spatial strategy seems to focus more on housing need than on employment land use.

Comment 2-5 - The spatial strategy should have regard not just to the location of development, but also the usage of the development land. **Space is three dimensional** - the density of development should be considered and, where appropriate, the need to build basements for car parking or other useage and taller buildings, where this can be done sympathetically with the surrounds.

Comment 2-6 - Para 4.6 of the draft Local Plan seems to imply that the further developments listed are not considered with regard to their sustainability. This seems counter to what is in the NPPF and any development should be appraised on this basis - rather than simply identifying an area to build because it is available to do so.

Comment 2-7 - Para 4.9 states that the draft Plan *“represents an increase in new homes and employment floor space in line with the aim of the NPPF, NPPG, our Economic Strategy, and the best available information on the likely levels of development by 2031.”*

- This statement does not appear correct as the figures don't have regard to objectively assessed need as required by the NPPF and NPPG. It seems to be solely developed with regard to an interpretation of GBC's own Economic Strategy and possibly the agenda of the Council Executive, which is counter to the election manifesto which is to protect the Green Belt. We have not had a public consultation or debate on the sort of economic growth people want in Guildford - the strategy and type of growth would have a huge impact on the shape of the borough. (A parish-based survey showed that 89% of respondents could see no benefit to the plan as it stands.)
- Can GBC argue that sustainable growth means development in one of the most built up parts of the country - rather than growth elsewhere in the UK?.
- Arguments for growth are circular, with each argument supporting another. If one argument is unfounded, the case for growth collapses, for example, lack of affordable housing is given as a key reason why employers would consider leaving Guildford and the other, equally important, reason given is the congested network. There is insufficient funding available to make a real impact on congestion and no impact survey has been done to estimate the effect that additional growth will have. The costs of additional infrastructure to support new growth is likely to offset much of the affordable housing quota, which will result in no perceivable net benefit.
- Half the borough's workers commute out of Guildford and hence their support towards the local economy is minimal. Shouldn't there be greater weight given to the views of those who support the local economy (financially or otherwise) than to those who are passing through?
- The numbers of houses and employment land have not been determined on the "back of the best available information". For example:

i) The figures are based on interim 2011 population projections from the ONS and then extrapolated for a further period - rather than on the more complete and more recent 2012 ONS figures (which incorporate the more recent Census).

ii) The ONS projections do not appear to have been adjusted to take into account information about student numbers and the way that those living in HMOs may have distorted the Census results (due to the way information was gathered in the Census).

iii) The figures are based on ONS projections based on migration during a period of rapid growth in the University. It doesn't consider information about the future growth of the University (particularly that UniS isn't planning to continue growing at this rate over the length of the Local Plan.).

iv) The growth of the University has been partly fuelled by Government policy to bring more young people into higher education. This has seen a rapid increase in University places, which will not be matched going forward by the rate of population growth in the UK.

v) Employment growth over the last few decades has resulted from societal trends (the move to dual incomes) and more students working part time during their studies - the same rate of growth is therefore unlikely over the next 30 years (or Local Plan period).

vi) Employment and housing growth should consider that a large proportion of people in Guildford work out of the borough, particularly in London. Is providing accommodation for future population growth in Guildford the most sustainable solution? This approach results in pressure on infrastructure (particularly transport infrastructure). Perhaps a more sustainable solution is for this future accommodation to be in London. It should be noted that despite London's target housing figure of 49,000 homes, compared with the current target of 13,040 for Guildford, the actual resulting population growth figure for London is less than 1.4%, whilst for Guildford it is almost 23%. There is no evidence to support the assumption that employers will ever employ someone based on the distance they travel to work.

vii - Similarly, a large proportion of workers commute into the borough. Is the provision of future employment land in Guildford the most sustainable solution? Would the total commuting time be reduced if future business was located in Whitehill and Bordon, as an example, opposed to Guildford? The UK as a whole would benefit more from this form of growth.

viii - Bottom-up analysis of employment land use should be considered, based upon:

- how many people live in Guildford;
- what proportion work;
- what proportion work in Guildford;
- what proportion of those who work in Guildford will work at home (NB. We need to consider modern trends for homeworking, hot-desking and shift working, which results in a lower requirement for employment accommodation - and more efficient and sustainable use);
- what office, retail, industrial accommodation is required? (NB. We need to consider work in the community, eg care workers based in the field), hospitals and education establishments; and
- other requirements, including agriculture.

ix - Borough councillors have expressed a wish to “share the load”, yet the vast majority of planned housing (70%) is in the countryside, on Green Belt. This is not in line with NPPF guidelines.

Policy 3 - Housing mix

We object to this policy.

Comment 3-1 - Para 4.15 states that *“We want to cater for all types of housing to meet the needs and demands of different people in our community. This includes families, older people, people with disabilities, travellers and students. New housing developments must take account of local need to create balanced sustainable communities and give a genuine choice in housing.”* Why is there an emphasis on providing such a mix of property types and sizes when there is a definite shortage of smaller, lower priced properties? It would seem that flats, close to the town centre (along areas in Walnut Tree Close), would seem appropriate, particularly with more traditional terraced houses and larger buildings in the neighbouring areas of town.

Comment 3-2 - Density as an issue should be considered in more detail within the spatial strategy in Policy 2 - as described in the notes above.

Comment 3-3 - Students of the University and their requirements for accommodation are different from other education establishments in town and should be treated on a different basis: There is a strong case (on grounds of sustainability and performance outcome) that accommodation should be provided for the vast majority of University students on campus. There will be some exceptions (mature students with families, local students preferring to remain with their parents). This isn't unrealistic - top American Universities (which incidentally sit much higher up the international rankings than the University of Surrey) typically have more than 90% students living on campus. (Harvard, as an example, has 99%.)

Comment 3-4 - It is worth noting that the campus at UniS does provide accommodation very close to the town centre. This still enables students to feel very much part of the town (particularly compared to universities where the campus is situated some distance from the town centre, for example UEA/Exeter/Lancaster/Warwick/Bath to name a few).

Comment 3-5 - Student accommodation can be provided much more densely than family homes (as it allows larger groups to share communal areas and facilities), which allows the University to provide safer and better quality accommodation (better value for the money) on campus than can be found in converted houses in the town.

Comment 3-6 - Why does the Policy state that 60% of students should be housed *“on the University campus or on University owned land”*? The University target should be on the campus only - otherwise there is the opportunity to retain land at Hazel Farm, buy up land in town that is better suited to full-time Guildford residents, or build on its other landholdings, such as Blackwell Farm, where the need to do so can't be demonstrated on sustainability grounds. There is little evidence to show that the University has attempted to fulfil the target of 60% of students living on campus (first set in 2003), but has instead changed the target from 60% to 42% (in its 2009 Estates Strategy). Likewise, it has land banked several thousand units of housing, by not fulfilling a “need” that was established in 2003. Adding “University owned land” to the proposition would effectively remove any barriers to University growth - a growth that is unlikely to be acceptable to anyone outside the University.

Comment 3-7 - The target for student accommodation on campus should be a minimum of 85% across all full-time equivalent students. This would be in line with targets set by Oxford City Council.

Comment 3-8 - Para 4.36, which describes the policy on HMO, should be extended so that no undergraduate university students should be able to rent an HMO.

Comment 3-9 - The Policy states, “*We will also expect to see Traveller accommodation provided on site as part of any proposals that could reasonably be considered to form part of a strategic development.*” Traveller sites (temporary or permanent) in the Green Belt are considered “inappropriate development”, except in very special circumstances and should not be considered to form part of a strategic site development located on the Green Belt.

Policy 4 - Affordable homes.

We object to this policy.

Comment 4-1 - If affordable housing is what the borough needs, then why rely on developers to provide this? More affordable housing should be provided on GBC-owned land. The caveat in para 4.44 that developers would not be required to provide this quota of affordable housing unless it was “*economically viable*” means that whatever percentage of affordable housing is specified, it is unlikely to be met. Without the removal of this “viability” clause, this policy is meaningless.

Comment 4-2 - There is reference to off-campus student accommodation in Policy 4. There shouldn't be any such developments for University of Surrey students as this should all be on campus, especially as there are existing unused planning permissions for more than 2,121 student residences on the Manor Park site. These unused planning permissions should be fully met before any further planning permission is granted to UniS, especially given their harmful impact on the supply of affordable homes within Guildford. As with routine domestic planning applications, a window of opportunity should be given for completion, after which the site reverts back to its previous status.

Comment 4-3 - In the section headed “affordability and need”, we disagree with the suggestion that building more houses will bring down prices. House prices in Guildford are driven largely by the borough's proximity to London and an outflow of workers seeking better value-for-money homes in attractive locations within the commuter belt. There is no evidence to support the supposition made, as demand for property within a short commute of London has no current boundaries.

Policy 5 - Rural exceptions homes

We object to this policy.

Comment 5-1 - Whilst rural exception schemes can help to meet local housing need, they need to be located in areas where they will have minimum impact on the environment and character of the village. We are also opposed to rural exception houses being located outside the settlement area and on the Green Belt.

Policy 6 - Making better places

We object to this policy.

Comment 6-1 - This Policy needs to be more precise about the areas that should be improved as part of the Local Plan. Consider the area on the Research Park and around the Hospital, Tesco and Manor Farm. There are vast areas of car parks that should be used more efficiently. There are also areas (the Research Park) where the land area is used for just 40 hours a week. Making better places would result in housing development on these particular areas of land.

Comment 6-2 - Only one respondent to the local survey carried out by the Guildford Parish Forum thought there was any benefit to the draft Plan for parishes and this was the only urban-based parish. It appears from this that parishes, in the main, do not feel their “place” is being made any better. Suggested local improvements could include:

- transport networks to improve the lives of Compton residents (regular and punctual bus services and parking for commuters at Farncombe).
- Additional safety measures on the B3000 and safe places to cross, as well as an effective speed-reduction programme (with frequent police presence).
- Ensuring verges are cut back to improve sight lines and the appearance of rural areas.
- Regular litter collections with better education programmes about litter prevention.

89% of respondents in the Guildford Parish Forum survey could not see any benefit for their Parish. Parish councils work hard to maintain and improve their parish and, if they can't see how the Plan will make parishes “better”, then this should be given serious consideration and not dismissed.

Policy 7 -Sustainable development

We object to this policy.

Comment 7-1 - Any policy that relates to sustainable development must consider population growth, infrastructure and impact on landscape/biodiversity. It is too narrow just to consider sustainable development in terms of reduced energy usage, carbon emissions and waste, as this policy does. Whilst laudable, these aims do not address the fundamental element of

sustainability in the context of planning building, which is the appropriate siting of development. This must take into account land availability as well as other constraints relating to designation, eg AONB, Green Belt, international and national environmental protections (SPA, SSSI etc) and other factors, such as ancient woodland, ancient hedgerows, National Trust land. These constraints are endorsed by the NPPF. As noted in the Ministerial Foreword to the NPPF, in the context of discussing sustainable development, it is stated that, *“Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.”* Policy 7 should therefore not just be about conserving energy and reducing waste, but about promoting biodiversity by protecting our natural and landscape heritage and, importantly, **restoring and rebuilding it**.

Comment 7-2 - It is not sustainable development to accommodate migration into Guildford at the rates proposed in the draft Local Plan. This migration isn't necessary for the economic wellbeing of Guildford. It will result in congestion on our roads, blight to the landscape and the loss of important business to Guildford. It will alter the character of the town and countryside, which may result in more people leaving the area than was previously the case - a factor that has not been included in the housing need report. Guildford is promoted as an attractive place to live; however, without limiting the level of housing that can be accommodated, there will be a negative impact on landscape character and this key selling point is lost. The impact on public services, such as schools, GP surgeries, dentists, paramedics and the police, must be assessed before any additional growth is planned. It is not acceptable to nominate an area as sustainable based on the proximity to services alone there should be evidence to demonstrate that the services have the capacity to grow/expand with growth on this scale.

Policy 8 - AONB

We object to this policy.

Comment 8-1 - Countryside and villages in the Area of Outstanding Natural Beauty should be given the highest status of landscape protection in line with legislation. There should be no major development whatsoever in the AONB. (There is no exceptional public interest that would justify overriding this.) The wording of Policy 8 protects the views into and out of the AONB **only with regard to AONB itself and land that is designated an AGLV**, whereas Government Policy is very clear that **all land** which forms the views into, and out of, an AONB should be protected.

In its March 2014 Planning Practice Guidance on Natural Environment - Landscape (which amplifies the NPPF), the Government emphasised the importance of protecting the setting of AONBs and National Parks. This affects proposals on land outside an AONB that might adversely affect its setting.

It states that under Section 85 of the *Countryside and Rights of Way Act 2000*, "relevant authorities", including planning authorities, are required in "exercising or performing any functions in relation to, or so as to affect land" in National Parks and AONBs to "have regard" to their purposes. It goes on to state:

"The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which have an impact on the setting of, and implementation of, the statutory purposes of these protected areas."

Policy 8 does not follow this - although the 2002 Local Plan did. We therefore regard the Policy 8 as a dilution of GBC's earlier policy on AONB and not in line with Government policy.

The deleted policy from the 2003 local plan reads:

"Policy RE5 AREA OF OUTSTANDING NATURAL BEAUTY (AONB)

The Surrey Hills Area of Outstanding Natural Beauty, as defined on the Proposals Map, is of national importance and will be subject to the most rigorous protection. Development inconsistent with the primary aim of conserving the existing landscape character will not be permitted. Small scale development for agriculture, forestry or outdoor recreation as well as that in support of services for the local community will normally be acceptable provided the proposals conserve the natural beauty of the landscape. Important views to and from the Area of Outstanding Natural Beauty should be retained."

We question the rationale behind the removal of the line: *"Important views to and from the Area of Outstanding Natural Beauty should be retained"* .

Adherence to government policy is of paramount importance as it directly affects the proposed site on New Pond Road, which is both Green Belt and AONB, and Blackwell Farm, which is Green Belt and AONB in part and where the topography results in panoramic views over a great distance.

Comment 8.2 - Modifications to the Surrey Hills AONB boundary are currently under review and the boundary may be extended to include adjacent AGLV. Until the review is complete, AGLV should be given the same protection as AONB within GBC's Local Plan. This would be in line with the position that local authorities in Reigate and Banstead, Mole Valley and Tandridge have taken on AGLV in their core strategies:

"2.4.3 AGLV: Our policy states that the same principles will be applied to the AGLV as the Area of Outstanding Natural Beauty (AONB) until such time as there has been a review of the AONB boundary. This approach is considered appropriate and clear: it is consistent with the evidence (the AGLV review EP24) and the approach adopted in the adjoining Core Strategies for Mole Valley and Tandridge. The National Planning Policy Framework (NPPF) recognises that there may be local designations, and that protection of these should be commensurate with their

status: whilst our policy affords the same level of protection to the AGLV as to the AONB as an interim measure, this is considered pragmatic given the current review process.

*2.4.4 Natural England has identified the Surrey Hills AONB as one of only two AONBs in the country where a boundary review will be considered, and has now agreed to support the process of evidence gathering to inform this process. This work is currently at the very early stages (**Annex 1**); however, after the review has been completed, and any changes to the AONB boundary agreed, areas of AGLV outside the AONB will continue to be protected under part (b) of the policy.” https://www.reigate-banstead.gov.uk/Images/RBBC-15Matter2_tcm9-51694.pdf*

Policy 9 - Villages and major previously developed sites

We object to this policy.

Comment 9.1- The Green Belt and Countryside Study uses flawed methodology. It cannot, therefore, be used as a basis for determining which villages should be inset within the green belt.

Comment 9.2 - In 4.111, it is stated, *“All our villages, except Ash Green, and our major previously developed sites are currently washed over by the Green Belt designation. National planning policy states that only those villages whose open character make an important contribution to the openness of the Green Belt should be included in the Green Belt.”* This suggests that national policy **requires** villages that do not contribute to the openness of the Green Belt to be inset. This is not correct. National policy permits villages to be removed from the Green Belt where they do not contribute to openness, but it is at the discretion of local authorities whether they opt to do this or not.

Comment 9.3 - GBC’s definition of “openness” is unsound, using the presence or absence of a permanent physical features, such as trees forming boundaries, as a criterion for “openness”. “Open” in the Green Belt context means absence of development, not absence of trees/ woodland.

Comment 9.4 - Although, in some cases, inseting villages within the Green Belt might be appropriate to meet housing need, we are opposed to the extension of settlement boundaries, which has been proposed for many villages (whether inset or washed-over), particularly where changes to boundaries result in villages merging, which would affect character, size and resource.

Comment 9-5 - Para 4.118 (rural areas) - We note that this section describes the problems with poor internet and mobile coverage, but doesn’t give any planned solutions.

Comment 9-6 The settlement & hierarchy document ranks villages according to their proximity to key services, but does not take account of their capacity to grow. The maps used for

Compton are incorrect and actually take in parts of Binscombe. This could potentially reduce the category listing from “medium” to “small”. It also means that Compton has no school within 1km of the centre. We do not believe that private schools should be included in the ranking and note that that similar reports in other areas do not include private schools.

Furthermore the area in question was not properly determined, with some parishes offering results for the village, some for the “settlement area” and others (such as Compton) for the parish.

Comment 9-7 - Compton settlement area remains within the Green Belt and is not affected by radical changes to its settlement boundary. However, the Green Belt within the Parish is affected on an enormous scale due to Blackwell Farm. The percentage growth from such a proposal would triple, or even quadruple, the size of the Parish. It is unclear how such a huge change would be managed or what impact such a change would make to the character and future of the village in terms of its categorisation and perceived growth potential.

Policy 10 - Green Belt and countryside

We object to this policy.

Comment 10-1 - Whilst Compton PC fully supports the intention to protect the Green Belt in accordance with the NPPF, we consider Policy 10 (and the accompanying analysis of the Green Belt in pages 52 and 53) to be inadequate.

Comment 10-2 - The Green Belt and Countryside Study, which has informed this Policy, is deeply flawed and not fit for purpose. For example:

- i) the definition of “sustainability” is too narrow, referring only to proximity to facilities;
- ii) it does not take into account landscape character of the sites or designations such as AONB;
- iii) it is inconsistent and incorrect in the way it applies its methodology;
- iv) there is no weighting given to how well a site fulfills a particular Green Belt function
- v) land parcels undergoing assessment have been carved up in an arbitrary and inconsistent manner.
- vi) the scoring used seems highly subjective and differs (quite considerably) from the same study carried out 14 months earlier. It is simply not viable that in 2013, 84 out of 208 sites were classed as not fulfilling two or more of the five purposes of the Green Belt, yet 14 months later 111 are “under performing”; and the variations between the two assessments affect no less than 88 sites.

Comment 10-3 - The Policy omits to mention the need for permanence of Green Belt boundaries (NPPF para 79).

Comment 10-4 - The Policy does not define the exceptional circumstances required to change Green Belt boundaries (NPPF para 83). The Green Belt Topic sheet, which sets out GBC's interpretation of the exceptional circumstances, takes a quote from the Planning Inspector's report for the Bath and North East Somerset Council Core Strategy. The quote suggests that housing need alone can constitute exceptional circumstances. However, when you look at the context for these comments from the Planning Inspector, you realise that there were other circumstances (which the Green Belt Topic Paper has ignored), which, when combined, did constitute exceptional circumstances (in the view of the Inspector at least):

163 .PP1 refers to development of around 300 dwellings. This capacity reflects the Council's view that substantial parts of the allocated area are not suitable for built development and my assessment above largely endorses that approach. The text should make clear, however, that this figure is not a cap on capacity if all the place-making principles can be met.

164. Overall, there would be a loss of Green Belt, localised harm to the AONB (nonetheless great weight should be attached to protecting this landscape); - 37. Bath and North East Somerset Council Core Strategy, Inspector's Report June 2014 only slight harm to the Wansdyke SM, with a small benefit from planned positive management measures; and limited and localised harm to the setting of WHS. The allocation would achieve 300 dwellings at a highly sustainable site at the most sustainable town/city in the district. Of these 300 or so dwellings, 40% would be affordable (in accordance with my conclusion under Issue five) making provision where the affordable need is greatest. There are no acceptable alternative sites at Bath (see below) which could replace the contribution to housing that this site would make.

165. I consider that there are the exceptional circumstances to justify removing land from the Green Belt and for major development within the AONB. The need for housing and the benefits of additional housing in this location at Bath outweigh the harm that would arise, taking into account the great weight that must be given to protecting the AONB and heritage assets. The Council's decision to allocate this site represents positive planning and is justified. This allocation is needed to make the plan sound. I have amended the detailed wording of the proposed policy and the Concept Diagram to reflect my conclusions above on the detailed points and to take account of my conclusion under Issue six. (MMs 9, 21, 36, 37, 39, 40 and 41). In the light of my assessment above that land adjoining South Stoke Lane needs to be retained in the Green Belt, the Council is justified in concluding that there is no scope to identify any safeguarded land here (MM38 and part of MM109).

It should be noted that:

1) The scale is quite small with 300 houses.

- 3) When considering the benefits against harm done to Green Belt, we must also add the loss of farmland, impact on traffic congestion, the ecological impact (including birds of principal importance) etc.
- 4) The site in Bath is described as being a sustainable location
- 5) There are no alternative sites in Bath.
- 6) The Inspector says that this is the most sustainable town/city in the district - but is this true of Guildford?
- 7) The evidence base produced by GBC doesn't even allow us to assess where is the most sustainable location for housing.
- 8) Will Guildford get anything like 45% affordable houses on Blackwell Farm/Gosden Hill/TFM once access issues and other costs are all factored in?
- 9) The Green Belt isn't the only place where affordable houses can be built.

Essentially, the circumstances that the Inspector believed were exceptional at Bath were not simply due to housing need alone. These circumstances are very different to the circumstances in Guildford.

Comment 10-5 - Given that 89% of the borough is designated Green Belt, and there is only a small amount of countryside that is outside the Green Belt boundary, it seems strange and inappropriate that most of Policy 10 focuses on protecting countryside beyond the Green Belt (around Ash) from inappropriate development rather than enforcing the principles within the NPPF of the Green Belt itself.

Comment 10-6 - We support the intention to support sustainable rural tourism and leisure developments that benefit businesses, communities and visitors.

Policy 11

We support this Policy

Comment 11-1 - *"In order to protect Ash and Tongham and Ash Green we will designate an Area of separation between Ash and Tongham urban area and Ash Green to ensure that the settlements retain their individual character and prevent their merger."* We support this intention but ask, why the same consideration is not given to other areas of potential coalescence, eg Onslow Village and Park Barn /Wood Street Village, which are being brought together by the proposed Blackwell Farm strategic site, and other sites whose individuality is threatened by inseting?

Policy 12 - Historic environment

We object to this policy

Comment 12-1 - Our concern is that this isn't a policy, but just a fluffy wish. How is this going to be enforced? Look at the example of the scheduled ancient monument, which is the moat at the old Guildford Manor House - the setting for this has been ruined over the last 10 years and this is ongoing with the construction of the University Vet School buildings.

Comment 12-2 - Compton has 31 listed buildings / structures and yet no interventions are planned to help prevent further damage from vibration caused by the ever increasing volume of traffic on the B3000.

Comment 12-3 - Places of historic importance that double as popular tourist attractions (Watts Chapel, Limnerslease, St Nicholas Church, Loseley Park can be linked via sustainable walkways/cycle paths, yet this has not been added. The results of the survey on tourism, which feeds into the economy paper, will not be available until after the consultation.

Policy 13 - Economic development

We object to this policy.

Comment 13-1 - There is no evidence to show that employers of any business (whether new or otherwise) will employ anyone based on their location or that the 50:50 ratio of commuting in and out will change. Increasing the number of homes and businesses will therefore increase the volume of trips/traffic on commuter trains, which are already over capacity, and where parking at key stations is inadequate.

Comment 13-2 - Much has been made of the need for greater retail space. However, this was based on an outdated study, which presumes growth when others predict a reduction based on internet-shopping trends.

Comment 13-3 - The plan for economic development focuses heavily on employers' needs for low-cost housing for workers, yet very little is made of employers' complaints about the transport network and congestion. Building more homes will not necessarily result in affordable housing, especially the executive homes planned for the strategic sites, but further congestion is almost guaranteed. As this is a key factor that determines whether employers will stay in the area, it must be addressed.

Comment 13-4 - Unsubstantiated claims by the University relating to its role in the local economy must be discounted or viewed in context of its net benefit.

Comment 13-5 - Most of Surrey has the ability to take on fast broadband connections; this should improve the ability for virtual meetings and, from a sustainable perspective, this approach should be encouraged rather than increasing business clusters on the basis that face-to-face networking is essential.

Comment 13-6 - Good broadband connection should also play a far greater role in home care, with the ability for non-contact medical consultations, home care management and diagnostics and even post-care hospital treatment. All would create greater capacity within our healthcare system and save money.

Policy 14 - Leisure & visitor experience

We object to this policy.

Comment 14-1 - This policy is inadequate and incomplete. It is based on a survey completed in 2011 that is acknowledged to be out of date, as it does not reflect current opinion (support of rural pursuits and protection of the countryside in particular). The updated survey will not be ready for release until October 2014, ie outside the scope for consultation.

Comment 14-2 - The visitor economy is a vital part of Guildford's overall economy, it links into our history and heritage and provides an important link between the various parts of the borough, as each has its own important visitor sites. This area must be treated with the same level of importance as all other economic input and not as an addendum that can be attached at some point after the consultation.

Comment 14-3 - It is important that Guildford is not just seen as a place to "pass through", but as a place to stay, enjoy a holiday/short break, enjoy the history, heritage, culture, music, drama, landscape, bars, restaurants, hotels, pubs, churches, walks, etc. Guildford is so much more than a "shopping" centre and, without a comprehensive policy, the rural economy is left to pick up the pieces once other policies have been finalised. This is not acceptable and for the above reasons, we object to the weaknesses of this policy.

Policy 15 - Guildford Town Centre

We object to this policy.

Comment 15-1 - There are many sites within the town that would benefit from regeneration and development on brownfield sites, in line with the NPPF. We have concerns that opportunities are not being fully explored and that exploratory work that would determine probability has not taken place. Without relevant surveys, work that might be possible within the five-year time frame may fall outside it, thus putting unacceptable pressure on Green Belt and greenfield land.

Comment 15-2 - Land near the railway station has been put forward by Guildford Vision Group and Allies and Morrison, with options demonstrating how intelligent planning can produce sites that are both pleasing on the eye, meet reasonable density levels (without crowding) and can overcome issues such as flooding.

Comment 15-3 - Many of the reasons given by GBC for the continued focus on Green Belt sites has been due to shortage of deliverable sites on previously developed land. We believe that insufficient effort has been made to make sites viable and that the proposition to deliver almost 70% of new builds on Green Belt /greenfield is totally unacceptable without fully exploring all possibilities for brownfield development.

Comment 15-4 - There is 4.69 hectares of surface level car parking in Guildford that is owned by Guildford Borough Council, in addition to surface car parks owned by Surrey County Council and some in private ownership. The council-owned land could be developed within the five-year timescale without losing parking spaces if subterranean parking was adopted or with one larger multi-storey replacement. This would go along way to balancing the site allocation, which is weighted too heavily outside the town.

Comment 15-5 - We welcome the ethos of traffic-free zones within the town centre to create pedestrian-friendly areas. However, we cannot support this without a full traffic and transport survey, which looks at the impact of these changes on the surrounding areas (and changes to the gyratory and key routes in and out). This applies to residential areas within the town as well as surrounding villages.

Comment 15-6 - There appears to be no major, or long-term, solution to the congestion problem that blights Guildford. Any mitigation that might be achieved from minor changes to the network is likely to be outweighed by the impact of further growth, and tackling the problem full-on initially would make more sense than spending vast sums of money on what could be a temporary solution.

Comment 15.7 - The river is an important and under-developed asset. Many towns have successfully developed riversides, but a positive and speedy approach is needed to avoid continued ad-hoc development here, and to help meet Guildford's five-year housing supply using brownfield sites.

Policy 16 District & local centres

We object to this policy.

Comment 16-1 - We object to unclear boundaries between residential areas in district settings and the inappropriate assumptions that there will be any connection between housing and industry. Employers do not employ on the basis of proximity to home and permitting industrial growth in rural centres is not only "out of keeping" for many villages, but results in more traffic and deliveries in areas that don't have the infrastructure to cope.

Comment 16-2 - There are three venues for hire in Compton, the Village Hall, The Club and Puck's Oak Barn. All have issues with parking and Compton Parish Council is in the difficult

position of balancing the views of local business/amenity versus the needs of residents to retain green space. The B3000 does not have yellow lines and the ideal all-round solution would be to park on the road, which would in turn double as a cost effective form of traffic calming. However, this idea is not fully supported by police or presumably the 14,000-16,000 motorists who use the road. A bus service that could be hired from the park and ride at Onslow Village to facilities might address the problem and indeed the problem for other venues/facilities in the area? Assistance with impact assessment would be helpful.

Comment 16-3 -The issues that can be caused by mixing business and residential use are exacerbated when this is on a wider scale, such as the town centre and the suburbs, and hence we support clear dividing boundaries between the two.

Comment 16-4 - We do not support additional industrial expansion where traffic routes and delivery routes have not been considered or previously adhered to. There has been a marked increase in HGVs through Compton, travelling to Godalming. The better route is via the A3 for vehicles without a height restriction. Impact assessment must therefore be based on hard facts and include the impact on our roads and the wider community.

Policy 17 Infrastructure and delivery

We object to this policy.

Comment 17-1 - There is insufficient detail within the infrastructure report to make an informed decision. It is not clear how the minor adjustments to the junctions and roads would enable our network to cope with the increased traffic that must be expected with the level of growth Guildford is aiming for.

Comment 17-2 - There is no impact assessment to determine what impact increased traffic would have on town suburbs or surrounding villages and no plans therefore to prevent or minimise this. Many towns prevent traffic from spilling out onto residential roads, but we can see no evidence of such schemes in this report.

Comment 17-3 - We support the concept of sustainable transport and would hope that funding would be made available for real-time bus services and improved pathways outside the town centre too. The sustainable transport corridor is an interesting idea, although exactly where it should go to and from divides opinion. These ideas work well in Central London and, given Guildford's contribution to the wider economy, it would be hoped that central funding would be made available for improvements to traffic and transport plans. Without these, we fear all other plans will fail.

Comment 17-4 - There is great concern over the order of payments and delivery and whether the infrastructure will precede development? Only a full impact assessment can determine whether the current infrastructure could cope with the growth planned. It is not acceptable to

build on Green Belt sites when brownfield sites exist on the basis of failure to provide sufficient infrastructure. New housing should be built on brownfield sites where major infrastructure is already in place. Increased capacity is a real issue (roads, drains, sewers, electricity). However, there is no detail in the report as to how this will be dealt with.

Comment 17-5 - The report refers to various locations and how plans to 'link' one route with another. Again it is not clear exactly where the link will be, the consequences and/or advantages of it. The impact relating to the high volume of traffic on both sides of the B3000 is well documented. Better links off the B3000 to the A31 at Puttenham would be welcome, but adding to the traffic volume without major intervention will result in chaos. There are already long tailbacks through The Street in Compton at peak times and when flows are impeded elsewhere. This results in drivers choosing alternative routes such as Priorsfield Road, Down Lane, and through Shackleford and Hurtmore.

Comment 17-6 - The impact on individuals' quality of life should not be underestimated as the noise, the damage from vibrations, the general pollution, combined with inability to cross the road or simply get from A to B in a timely fashion, takes its toll. This and road safety is one of the main reasons people give for leaving the village.

Comment 17-7 - The infrastructure in Compton just about copes with the number of dwellings, but we do suffer fairly regular power cuts during the winter and parts of the village are subject to flooding. The drains are full a great deal of the time and small-scale infill is probably the extent to which we can cope without serious consequences.

Comment 17-8 - Flooding is a serious issue in many parts of Guildford and we strongly object to building on land that has not been previously developed as this decreases the floodplains and soakaways, creating more impermeable surfaces and increased "run off". Appropriate redevelopment of surface car parks would be our preferred choice and this would be in line with the NPPF and elements of the Town Vision. As more than four hectares are owned by GBC, it should be deliverable within the timeframe given.

Comment 17-9 - The infrastructure document ranks alongside housing in terms of importance and is intertwined in terms of its relativity. The congestion on the B3000 and on the west side of Guildford exists already, yet the funding for this is developer-led. Which development does it relate to and if this is not approved or deliverable on the scale envisaged will much needed infrastructure be funded at all?

Information concerning traffic flow/patterns is based on a GTAMS study, which has known issues and hence is being revised. This information has to be in place as a starting block.

Policy 18 - Sustainable transport

We object to this policy.

Comment 18-1 - We support the principle of sustainable transport, but it is not altogether clear how the policy would work in practice, as developers cannot enforce practice and neither can GBC. Car-sharing has never been particularly successful and, given the inclement weather we have, who can be guaranteed to walk or cycle 5km to work every day or to the station? If the proportion of workers commuting into, and out of, Guildford remains at 50% (and there is little evidence to demonstrate that this will change in the foreseeable future) and if growth is to be at the rate suggested, then improving speed and comfort of commuting via public transport routes, such as trains and buses, might encourage people to leave the car at home?

Policy 19 - Green and blue infrastructure

We support this policy.

Comment 19-1 - We must preserve our attractive, accessible countryside, gardens, allotments and natural open spaces and, as far as is possible, our views onto the countryside. Nothing that affects the ability of AONB, conservation or Green Belt to fulfil their function, should be permitted to take place without very special circumstances and these should be clearly laid out.

Comment 19-2 - Urban farms are a popular addition to the rural economy and places such as Blackwell Farm would be ideally suited to this being in close proximity to Mane Chance horse sanctuary, Hog's Back Brewery and Greyfriars Vineyard, and all within a short trip to Watts Gallery and Loseley House.

Policy 2 (site allocation 60 - Blackwell Farm, Guildford)

We object to the inclusion of Blackwell Farm (site allocation 60) in this policy and to this site being put forward as a strategic site for development.

Comment 64-1 - Part of the Hogs Back site is located within the Surrey Hills Area of Outstanding Natural Beauty (AONB), which according to the National Planning Policy Framework, should be afforded the highest level of protection. The land that is not within the AONB, forms the views into, and out of, the AONB and should be given the same level of protection as the AONB under Government policy. Part of the site is also an AGLV and this AGLV countryside is pending a review for upgrade to AONB. We do not believe that there should be any development on Blackwell Farm until Natural England has completed this review.

Comment 64-2 - The entire site is within the Green Belt and fulfils all five Green Belt purposes outlined in the NPPF (80) very strongly. It:

1. Checks the unrestricted sprawl of large built up areas;

2. Prevents neighbouring towns from merging into one another - developing this site would remove much of the open space between Guildford and Aldershot; it would also merge part of our parish (almost 20 per cent under GBC proposals, 25 per cent under UniS proposals) with Guildford and bring the town closer to Compton;
3. Assists in safeguarding the countryside from encroachment;
4. Preserves the setting and special character of Guildford (the Hogs Back ridge forms an important setting to Guildford, as recognised in GBC's Landscape Character Assessment: *"The Hog's Back has a vital role in providing a dramatic landscape setting to Guildford...The steep slopes rising from the River Wey and distinctive elevated ridge landform provides a natural containment for, and backdrop to, the lower lying town centre and allows panoramic views across Guildford, to the Cathedral. Conversely, there are key views out from the town centre (High Street and North Street) to the steeply rising slopes forming the western end of the Hog's Back ridge. These create an open backdrop, and a strong rural context to the town...To the north the arable slopes north of the A3/A31 provide an important open backdrop to the emerging Manor Park site."* [Landscape Character Assessment, Rural Urban Fringe, p37, Jan 2007.] This western corridor provides the only remaining view of the Cathedral, where it rises out of an entirely rural landscape. Developing Blackwell Farm would remove this strategic view.
5. Assists in urban regeneration by encouraging the recycling of derelict and other urban land. By refusing to allow the University of Surrey to build on its Blackwell Farm estate, it would be forced to develop its brownfield estates outside the Green Belt at Manor Farm, where it has outstanding permissions for 3,125 staff and student residences; and at Stag Hill/the Research Park, where there are vast acres of surface car parks. It is perfectly possible to build offices and accommodation above car parks and development should be guided here rather than on the adjacent green field site.

Comment 64-3 - The Hogs Back is a historic route - England's oldest known road and forms an important gateway to Guildford. Domesday records show that Blackwell Farm was the site of the original Compton Manor; and Manor Farm is the only remaining unspoilt corner of the Henry II's Royal Hunting Park - the largest deer park in England. A large portion of Blackwell Farm is parkland and is of historic importance.

Comment 65-4 - The road system on the west side of Guildford is congested at peak hours and cannot cope with another 4,000-5000 cars entering the network. More than five million vehicles use the B3000 each year and this figure is on the rise. The volume has reached a tipping point with tailbacks throughout the village and the A31 at peak times. The Tesco and Cathedral roundabouts are also operating beyond capacity and additional traffic from Blackwell Farm would cause further problems and impede emergency vehicles travelling to/from the Hospital. The draft Plan does not give sufficient detail with regard to infrastructure for the site. Without this information, it is difficult to respond to the proposals in a meaningful way. However, we would be opposed to any access to, or from, the site via the A31. This would cut through the AONB and a roundabout/large junction would require illumination, which would cause widespread light pollution on the north and south sides of the ridge, also impacting the AONB. This would particularly affect Compton residents living in Down Lane/Compton Heights and possibly Sandy Lane.

Comment 64-5 - The Blackwell Farm site is criss-crossed with public and permissive footpaths and bridleways, which offer residents opportunities for walking, running, cycling and horse riding. We believe that there is an opportunity in the future to encourage further recreational use of the site (as was the University's stated intention in 2003 and a condition for removing Manor Farm from Green Belt) and to link the site with other visitor attractions in Compton, for example Watts Gallery and Chapel, Loseley House, and Greyfriars Vineyard. If the site was developed, this would not be possible, and the additional traffic that the development would generate would be to the detriment of the village's existing tourist destinations.

Comment 65-6 - Blackwell Farm is a working farm. Developing high-grade and versatile agricultural land (grades 2-3), such as is found at this site, is against Government policy.

Comment 65-7 - The Hogs Back is the only steep, north-facing chalk ridge in the SE and is home to rare plant species. It is also home to many protected animals and birds, including the skylark, yellowhammer, linnets and lapwing -- all of which are declining in number and classed as birds of Principal Importance for the Conservation of Biodiversity.