

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
Introduction	(d.)	Member of the public	Strategy covers period 2006-, we are now in 2009 and it will not be adopted until 2010.
	(d.)	Member of the public	The fact is that 95% of the consultation document is covered by the existing Guildford Local Plan. Annex 1 shows 27 core policies (updated GLP policies) and 95 saved GLP policies. The GLP policies are tried and tested, and they work. The council has accepted rules and ideals of quango bodies that have questionable basis in law i.e. are not a legal requirement. The GLP will be replaced with the LDF, that may well carry less weight in the courts and put the councils plans at a disadvantage. The strategy 'vision' takes us from GLP utility to LDF utopia; an unfitting proposition for a debt laden economy
	(e.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	Noted that Guildford Borough Council has carried out a lot of work on the Core Strategy. Much of the evidence base information is now dated whilst other key aspects are still not published. In reviewing Green Belt boundaries the strategy should be looking to at least 2031. Referenced The Secretary of State in her Proposed Changes to the draft Regional Spatial Strategy at paragraph 5.65. Sustainable development in the Borough will not be achieved unless the Green Belt review exercise is carried out and a longer term vision for the Borough put forward. Fails to set out the most sustainable locations for development. Noted that the Strategy will at least make provision for housing as recommended by the Secretary of State, although the Council's opposition to this is not hidden.
	(e.)	Vail Williams	Support reference to strategies from partners and other organisations but fails to recognise, the Royal Surrey County Hospital, University and Surrey Research Park which are major employers and community service providers. Text should reference these organisations.
Profile and key issues	(a.)	English Heritage	Note reference to the Borough's particularly rich and varied architectural heritage, designed landscapes and parkland and that maintaining the rich heritage and cultural scene is one of the five key issues affecting the Borough, together with the rural environment and landscapes. The single most pressing issue is stated to be reconciling development pressures while maintaining environmental quality. The statutory environmental bodies published 'Environmental Quality in Spatial Planning' in June 2005 with a view to assisting local authorities in the preparation of LDFs. The essential message being to secure an integrated approach to resolving such issues.
	(a.)	Environment Agency	Welcome the inclusion of flood risk in the Profile of Guildford, but concerned that not included in the Key Priorities for the Borough. Paragraph 2.7 covers a large number of environmental issues, which should be separated out to make clearer. With the ongoing work we are undertaking with you, and the reasoning behind this work, we believe the combination of development pressure and flood risk is a key issue, especially in the town centre and surrounding urban area.
	(a.)	Guildford Cathedral	It is noted that para. 2.1 states that the cathedral is a dominant landmark, it is also noted that the cathedral and the university of surrey are the only institutions that are specifically named in the profile. The dean and chapter would welcome further recognition of this, and hope that this might extend to positive planning for the future of the cathedral.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

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	(a.)	Guildford Society	<p>Question whether the figure of 85,100 is reliable for planning purposes. We ask for reference to be made to the complex web of journeys between work and residence which characterises Guildford. Reference is made to fact that many who work in Guildford commute from elsewhere. We ask that reference is also made to the fact that housing provided in Guildford often provides homes for people who work elsewhere. Migration from the London Region will remain high.</p> <p>High house prices in Guildford are significantly underpinned by people moving out from London. It is important to describe this dynamic because demand for homes will never be fully met in Guildford and a sophisticated, capacity and need-focused, not demand-led, approach to housing provision will be required to achieve sustainable development. It will provide a context for case by case decisions by the Planning Committee and by Inspectors. Welcome the reference to separation between the town and outlying settlements. Include the value placed on high quality countryside lying in such close proximity to the edge of Guildford town itself. Guildford has avoided a degraded urban fringe that is found in many urban areas. Development that is out of character, poorly landscaped and damaging to the urban fringe to be avoided in future.</p> <p>Reference should be made to AGLV as well as to AONB.</p> <p>The demand for homes from people migrating from London is effectively insatiable.</p> <p>It seems curious to attribute congestion and housing demand to an affluent economy. Affluence may increase demand and expectations. We suggest the housing points and congestion and infrastructure points are raised separately.</p> <p>A key message should be that infrastructure has failed to keep pace with development and that investment in infrastructure is needed both to service existing needs and to enable sustainable growth (as recognised in the SE Plan). Congestion is a particular concern with space at a premium as narrow routes converge to cross the Surrey Hills and with pollutants such as nitrous oxides exceeding standards in heavily congested areas.</p> <p>It would be helpful to specify attractive rural, urban and suburban environments, landscapes and rich heritage as well as the desirability of nurturing the successful cultural scene. The green, garden suburbs and craggy roofline of the town centre are highly valued as well as the countryside and need prizing if we are to accommodate change without harm.</p>
	(a.)	Natural England	We are pleased that protected areas, landscape and biodiversity have been mentioned.
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	<p>Paragraph 2.2 noted that Guildford's role as a regional administrative and commercial centre is growing. Important for the Strategy to create a policy framework for this to be achieved. Examples given of constrained sites: the Surrey Police Headquarters at Mount Browne and the adjoining College of Law at Braboeuf Manor.</p> <p>"many workers (are) unable to afford private homes close to work". The policies as currently formed will do little to rectify this situation.</p> <p>Referenced paragraph 2.3. The solution to this acknowledged problem is lacking in the document. Reference is made in paragraph 2.4 to a shortage of affordable housing particularly for first time buyers, contributing to the skills shortages. This subject is concluded in paragraph 2.9 which recognises one of the key issues affecting the Borough being the high levels of housing need. On page 15 under the heading of New Evidence Studies, little to inform the reader by way of such evidence to understand how the Strategy has been drafted. Lack of evidence in document.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

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	(a.)	Surrey County Council	<p>Agree that there is pressure on schools and note that housing development will cause increased pressure on education facilities. It's essential that the Borough has a policy of pursuing developer contributions to mitigate the cumulative effect of pupils yielded by developments. We would advise a commitment to supporting the County Council in achieving these aims through collection of S.106 contributions from developers. Were collection of S106 contributions not to take place, then it is important to note that there may not be sufficient capital available to provide sufficient educational infrastructure.</p> <p>We would like to see support for increased educational infrastructure to be included as a key issue.</p> <p>Guildford Castle should be listed in the series of dominant landmarks mentioned.</p> <p>Areas of High Archaeological Potential (AHAP's), Areas of Special Historic Landscape Value (ASHLV's), Scheduled Monuments (SAM's) and Listed Buildings should be mentioned here, drawing attention in particular to the Borough List of Scheduled Ancient Monuments, County Sites of Archaeological Importance and Areas of High Archaeological Potential, also the Historic Parks and Gardens Summary List included in the online evidence base.</p> <p>Greater detail on listed buildings, Conservation Areas and designed landscape and parklands should be included here, again drawing reference to the online evidence base documents.</p>
	(a.)	University of Surrey	<p>It is noted that the University of Surrey is one of only two institutions in the Borough that are specifically named in the profile. This shows recognition of the University's high profile and importance to the Borough. The University welcomes this and looks forward to working with the Borough Council to ensure that the University continues to thrive and to make a significant contribution to the Borough, the region and the nation.</p>
	(c.)	Member of the public	<p>2.9. The Key issues affecting Guildford Borough right now have changed. Two that spring to mind are: 1. 'managing the impacts of the affluent economy' has changed to managing the impact of a stagnant economy. 2. The bus station, a poor facility is one thing, a filthy facility is unacceptable. We need a new bus station.</p>
	(d.)	Burpham Community Association.	<p>More attention should be given to geographical constraints on parts of the borough, particularly those which make Guildford a classic 'gap town'. These constraints both define Guildford's character but also constrain some future developments.</p> <p>More attention should be given to the way the countryside preserves distinctive communities and the importance of ensuring that 'urban sprawl' does not lose this distinctiveness in the future.</p>
	(d.)	Downsedge Residents' Association	<p>Add that existing infrastructure suffers from considerable under-investment, especially in relation to transport and traffic.</p> <p>Add note of Guildford's hilly topography and the contribution made by the garden suburbs to Guildford's attractiveness.</p> <p>Assumes that retail will continue as in the past. Add "and help them adapt to new patterns of trading."</p> <p>Add new paragraph to reference the legacy of local government reorganisation - rural areas of Guildford (and the Ash/Tongham town area) have parish councils which bring local government very close to the people, while in the town area there is a vacuum, currently being partly filled by residents' associations.</p>
	(d.)	Guildford Business Forum	<p>Consider that in the absence of a refurbished or replacement Civic Hall Guildford has already fallen behind other similar towns as a cultural centre.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

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	(d.)	Guildford Constituency Labour Party	"There is also a strong network of cycle routes and footpaths" This is true for footpaths but overstates the position for cycle routes. There are significant gaps in cycle routes especially in the town centre, where there is no provision to avoid the inner gyratory, no provision for the High Street or North Street or the inner part of Epsom Road. Suggest "There is a also a strong network of footpaths and a reasonable network of cycle routes, but with some significant gaps especially in Guildford's central core area where there are no cycle routes"
	(d.)	Member of the public	Suggest that preparing for a future with Climate Change should be included as a key issue.
	(d.)	Member of the public	Need to retain land for food production. By the year 2050 the World will need to produce twice the amount of food it does now Guildford is not immune from this and needs to plan accordingly. We must ensure agricultural land is protected, particularly if we want to provide local food for local people.
	(d.)	The Clandon Society	An assumption is made about the number of people who wish to live and work in the Borough. This was raised in the SE Plan Proposed Amendment consultation and questions asked about the validity on those assumptions. As yet we have not had a response and therefore would question the use of this argument for further housing and development until figures have been justified. Particularly important taking into account the current economic climate.
	(d.)	The Clandon Society	Affordable housing is mentioned in this section and others. We are concerned that the reasons for statements about affordable housing relate to skills shortages etc., we believe there is a need for affordable housing for local people with local connections. We are worried about affordable housing being given to those outside our community. Numbers in SEP were queried in responses to the consultation.
	(d.)	Vail Williams	The pressure on existing infrastructure is mentioned, including reference to education. The text should acknowledge the Royal Surrey County Hospital. The Borough needs to support a service which is an intrinsic part of the community and enable the Trust to develop to keep pace of the needs of the increasingly ageing population.
	(d.)	Wanborough Parish Council	It would be helpful to put the Strategy in context if the following information was included: the size of the Borough in hectares; the size of the built up area (dwellings, shops, industry etc); the size of public open accessible space; the size of the remaining land (farm land, woods, unoccupied land etc) and the number of existing dwellings. With this outline it would be much more easy to judge the merits of the proposed policies.
	(d.)	Westborough, Broadacres & District Residents Association	Employment figures of 85,100 by 2010 questioned to be out of date. Based on available data and current economic climate this figure seems very unlikely. The figures that Housing & Infrastructure requirements are based on need revisiting and reassessing with some urgency. Guildford is essentially a London commuter town. Question why the affordability of private homes close to places of work is a concern when millions of others in the Home Counties commute into London. Question whether lack of affordable housing is contributing to Skills Shortages. what are exactly these Skills Shortages are (Numbers & types of occupations) and how this will be affected by the current Recession Question what evidence the statement about high levels of housing need is based on and what type of housing it refers to.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

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	(d.)	Woodland Trust	It would be worth noting that the Borough has a higher than average amount of ancient woodland – it accounts for almost 3% of the land area in the Borough against a figure of 2.4% for Great Britain as a whole. Such woodland is often described as the UK’s equivalent of the rainforests since it is our richest habitat for wildlife being home to more species of conservation concern than any other habitat (supporting some 232 species as outlined in the UK Biodiversity Action Plan, 1994). Thus, the amount of ancient woodland in the Borough is of significance and worth highlighting as an asset in the Borough’s profile.
	(e.)	Burpham Community Association.	Transport and transport impact should be recognized as a key issue (para 2.9) Managed growth without undermining the distinctive character is a key issue.
	(e.)	East Guildford Residents Association	Employment figures of 85,100 by 2010 questioned. Based on available data this figure seems very unlikely. As these figures are suspect this affects the Core Strategy and the demand for housing and employment land. This strikes at the issue raised in para 2.10 – reconciling housing and economic needs.
	(e.)	East Horsley Parish Council	Welcome the acknowledgement of pockets of deprivation. More emphasis is required on consulting with and gaining input from affected communities to ensure they have a voice Welcome the acknowledgement of extreme pressure on primary and secondary school capacity. Extra schools capacity should be built and ready in place before any major new housing developments are permitted. Shortage of schools capacity is already creating distortions in housing demand in neighbourhoods close to popular schools. (Para 2.7) Flooding, and measures to prevent it should be in a separate paragraph.
	(e.)	Guildford & Waverley Friends of the Earth	High car ownership and high levels of movement through Guildford Town Centre, and surrounding areas creates congestion on roads at peak times. Commuting to work and school by car is high, with public transport well used but sometimes disconnected (for example many car movements to railway stations rather than by public transport). The high cost of housing in the Borough, in particular in Guildford Town Centre, forces many to live a considerable distance from their workplace. Park and Ride sites serve the Town Centre and are well used. Whilst there has been some progress in providing cycling and walking routes, these are often disjointed, and do not cover key routes into and around the Town Centre.
	(e.)	Guildford Environmental Forum	Suggest “There is a strong network of footpaths and some good cycle routes.”
	(e.)	Guildford Environmental Forum	Key issues affecting Guildford Borough: Please add “Managing the impacts and mitigation of climate change”.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Holy Trinity Amenity Group	<p>Disagree with the statement that “There is also a strong network of cycle routes and footpaths”. We suggest this is reworded as “There are some cycle routes but a need to expand these. There is also need to improve and expand walking routes”. Walking and cycling provision compares poorly with many other towns.</p> <p>We also question the statement that public transport is “..well used..”. Rail transport for commuting to London is well used, and there is some commuting into Guildford by train – but scope for more. Other rail services are under used and under exploited, particularly the Reading / Guildford / Redhill link. Bus services are also less well used than in many other towns. Suggest reword as “Some public transport is underused and there is scope for greater exploitation of the general potential”</p> <p>Replace “Guildford has some spectacular scenery” with the more realistic “outstanding scenery”.</p> <p>Suggest also add: “Guildford is fortunate that the Green Belt designation has preserved relatively unspoilt countryside close to the highly populated urban area, allowing it to be accessed by walking by many residents”. It is the Green Belt that has primarily contained development, rather than Guildford’s “origins as a gap town”. None of the hill flanks are so steep that development is prevented, and, sadly, most of them have now been built on – except where protected as Green Belt.</p>
	(e.)	Member of the public	2.4. 'Guildford is in the main an affluent area. House prices are high...' is correct to a point, but disregards underlying high debt levels behind many businesses/people. The recession has already had a significant impact on property and new investment
	(e.)	Ockham Parish Council	Should "contain" be "constrain"?
Area visions	(a.)	English Heritage	The area visions are interesting, but raise issues of consistency. For example, the need to safeguard the distinctive heritage of Guildford town centre is recognised, but that of the rural areas is not; the River Wey is a conservation corridor in the rural areas, but not in the urban area; the character of villages in the rural areas is to be retained, but no mention of the character of Guildford.
	(a.)	Government Office for the South East	They are along the right lines. The vision could be strengthened and made more locally distinctiveness.
	(a.)	Guildford Business Forum	GBF supports the visions set out for Guildford Town Centre and Guildford Urban Area
	(a.)	Guildford Cathedral	The dean and chapter supports the vision set of for Guildford.
	(a.)	Guildford Environmental Forum	<p>The statements that: “The River Wey and its corridor will be preserved and enhanced as a green area and recreation space” and “Open space and recreation areas will form a green infrastructure network that defines and links urban and rural areas” are welcomed and supported.</p> <p>Concerned about the difference between the phrasing used for the River Wey where it is considered a conservation corridor in the rural area but not in Guildford Urban Area.</p>
	(a.)	Guildford Society	Concerned that the urban areas proposed, are too broad brush to guide growth and do not adequately reflect the Landscape Character Assessment.
	(a.)	Highways Agency	The HA assumes that the improved transport links as noted in the vision for the Guildford urban area will consist of sustainable transport improvements, in which case we would be supportive of this. For the Ash and Tongham urban area the HA would be supportive as noted above of the improved transport links as well as the provision of cycling and pedestrian links. The HA considers that cycling and pedestrian routes will contribute towards the general improvements of the transport links and towards the green infrastructure network.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Shalford Parish Council	As a statement of 'a vision for future development in Guildford Borough' (para 3.1), the document is necessarily so general that local residents have now way of knowing the core strategy would operate in practice and in particular how it would impact on individual communities. The aspirations expressed in the document are admirable and at this level of generality there are no specifics to which to object. As a result, this response be Shalford Parish Council to the consultation simply lists certain statements which it particularly welcomes.
	(a.)	Solum Regeneration Partnership	Agree that Guildford Town Centre will enhance its function as a transport hub but object to the last objective regarding major opportunity sites meeting local needs. This should be reworded to include "uses that best meet local needs and have regard to commerciality too," as commercial needs are a vital consideration in the planning of town centre sites.
	(a.)	The Clandon Society	Guildford and its environs have a unique position nestled between the North Downs and the Surrey Hills. To make it a "hub" or "Centre for Significant Change" will ruin its character. Also it is not clear if this relates to Guildford town centre or its environs.
	(a.)	University of Surrey	The University supports the vision set out for Guildford, and is encouraged that the international status of the University is highlighted together with the contribution and importance of the University of Surrey to the local economy and the character of the town.
	(a.)	Vail Williams	Support the positive reference to the "valued role of the Royal Surrey County Hospital".
	(d.)	Member of the public	Topography limits the possibilities for 'enhancement' as a regional hub. 'Maintain' the present position, while enhancing the amenities.
	(d.)	Westborough, Broadacres & District Residents Association	Town centre described in the Draft SE Plan as a "Centre for Significant change". Unclear what exactly is meant by the Town Centre and what this includes. The statement is not defined and is too vague to comment constructively or to base any hard plans.
	(e.)	Barton Willmore	Potential of future urban growth development within the 'Countryside Beyond the Green Belt'. It is considered that sites closest to the urban boundary are most suitable in location in the shorter term - text should be re-worded to take this into account.
	(e.)	Guildford & Waverley Friends of the Earth	No objection to the approach of this section but we seek the following changes and amendments to the text. "The Town Centre's contribution to culture and the arts will be improved and maintained" Comment: references to River Wey should be expanded to include the need to maintain and enhance these as a recreational and wildlife resource (as per Blackwater Valley area) Both housing and transport in rural areas needs to be improved "The rural areas will continue to be viable places in which to live and work with a range of services and facilities and improved transport and housing opportunities to meet local needs"
	(e.)	Member of the public	The following could be added: Commitment to the Protection of the Green Belt will be adhered to.
	(e.)	Ockham Parish Council	Do not understand the term "rural offer".
Vision for Guildford Borough	(a.)	Cranleigh Road Area Residents Association	We endorse the Vision Statements apart from the references to Guildford being a regional hub and 'centre for significant change' as stated above.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

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	(a.)	Guildford Business Forum	<p>GBF supports the vision</p> <p>However, GBF has some concerns about the vision, including the exclusive focus on previously developed land and regarding the provision of infrastructure.</p> <p>The vision also speaks of developing the arts - building on the range of venues already present- we trust that that vision is intended to include a refurbished or replacement Civic Hall.</p> <p>GBF welcomes the role of the Borough Council and Local Strategic Partnership and wishes to be involved in this process.</p>
	(a.)	Guildford Cathedral	The dean and chapter support the vision as set out in para. 4.1.
	(a.)	Guildford Constituency Labour Party	<p>“jobs, services and leisure will be accessible via.....safe walking and cycling facilities”</p> <p>The joint Guildford & Surrey Walking strategy has as one of its objectives: “To make pedestrian journeys pleasant and convenient, and to make sure that the route the pedestrian needs to take is the shortest and most direct and is made safe”</p> <p>The same applies to cycling facilities.</p> <p>The way to encourage walking is to make the routes pleasant and convenient (ie direct and not wandering round underpasses and detours). Then to ensure they are safe.</p> <p>Thus change “safe walking and cycling routes” to “pleasant and convenient walking and cycling routes, which are made safe”</p>
	(a.)	Guildford Environmental Forum	Especially in the light of the statement in the explanatory notes on past consultations, that “There were very few comments made about the vision at Preferred Options stage. It was suggested that the vision should include the protection and enhancement of areas of importance for biodiversity” we consider that reference to biodiversity or wildlife should be included in the new vision.
	(a.)	Guildford Society	<p>Please add: There will be investment in green infrastructure (as proposed in the SE Plan) throughout the borough to protect the quality of life of an increasing number of residents, enhance biodiversity and make the urban environment better adapted to higher temperatures and extreme weather events such as flooding anticipated as a result of climate change.</p> <p>Please add: Space for more environmentally friendly vehicles, such as electric cars, will be designed into new developments to prevent the street scene being degraded by private vehicles with no parking provision. (The Consultants commissioned to undertake preparatory work on the Guildford’s Landscape Assessment concluded that on street parking was the problem which detracted most from the quality of the landscape in Guildford.)</p> <p>The last point should include a reference to the desirability of Guildford’s distinctive communities, such as Boxgrove, Burpham and Mellow, retaining their identity, sense of community and services.</p> <p>We suggest it is important to refer to the challenge of balancing growth and quality of life recognized in the SE Plan and to avoid unqualified references to growth in the London Fringe.</p>
	(a.)	Highways Agency	Supportive of the vision for Guildford Borough to 2026 particularly of the commitment to reduce the need to travel through the sustainable location of all development and improving travel options. Supportive of improved public transport and other sustainable travel initiatives that give access to employment and services. We will also support and encourage Infrastructure improvements that would facilitate access through safe walking and cycling facilities.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Home Builders Federation	Support the Council's vision for the Borough especially the objective of providing homes to meet all ages, abilities and lifestyles.
	(a.)	National Trust	Believe that Vision should refer to the distinctive local character of the urban and rural areas of the borough as a whole. It is not only the villages which are distinctive – there is much that is also distinctive in the urban areas and within the countryside. Themes 1 and 2 also make reference to distinctive villages and these should similarly be amended to reflect the need to protect and enhance what is distinctive within the borough as a whole. Support the reference to essential development and creative design. The Vision should be reworded to reflect more fully the principles set out in PPS1 – sustainable development and high quality design.
	(a.)	Natural England	Vision should also recognise the importance of the natural environment and the protection and enhancement of biodiversity and landscape. It should also mention the importance of green infrastructure and access to the countryside for all.
	(a.)	Ockham Parish Council	Support the policy's first paragraph, but it does seem to be somewhat wishful thinking without specifics to show precisely how GBC proposed to achieve this balance.
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	Stated objectives are supported, notably: 1. To reduce the need to travel through sustainable location of new development 2. To nurture a sustainable economy, including local colleges 3. To provide a range of homes, including affordable housing and to; 4. Support Guildford as a regional hub, to accommodate growth and retain its regional importance. Research is still lacking. Acknowledged that within the Draft South East Plan, the London Fringe which includes Guildford has a primarily 'growth' role, and also that Guildford is a designated 'regional hub' and a 'Centre for Significant Change'.
	(a.)	SEEDA	Welcome the overall vision, particularly references to the role of guildford as a regional hub which will accommodate growth, and to supporting a sustainable economy and maintaining educational excellence
	(a.)	Send Parish Council	All Send Parish Councillors concerned that the rural areas of Guildford and surrounding villages are protected. We emphasize the crucial role of the 'Strategic Gap' (Green Belt land) between Woking and Guildford preventing the merging of the two towns and Send Parish within that area. However there is an awareness that there is a tension between the housing needs of the Borough and protecting rural landscape and villages.
	(a.)	Surrey County Council	General support for the objectives for key parts of the Borough. In particular, support the maintenance of Guildford Town Centre as a transport hub, a major retail and commercial centre, and in terms of new housing and a social and cultural centre. We also support the maintenance of the Guildford urban area as the Regional Hub. Ash and Tongham urban area is to be to include the District Centre at Ash Wharf and the Rural Areas is also to support District Centre at East Horsley. Whilst supporting these roles for key areas, we would advise reference to the protection of the Green Belt within the Rural Areas objectives. Nevertheless, we are concerned that education below post 16 is not obvious within the vision. High quality educational facilities i.e. Early Years and Schools contribute to the quality of life and economic well-being of residents. Schools are often seen as the heart of a local community. We should like reference to the importance of Early Years and School facilities to be acknowledged. The first paragraph could be amended to "whilst essential new development, including new and refurbished educational provision, and creative design is accommodated."

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

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	(a.)	The Theatres Trust	Pleased that the arts are acknowledged as being important for the health and well-being of communities. The performing arts are an important community element providing social, cultural, environmental and economic benefits.
	(a.)	University of Surrey	Support the specific mention of the University of Surrey's role in facilitating links with the business economy and schools and colleges, and the objective of maintaining educational excellence at all levels. However some concerns including the exclusive focus on previously developed land and regarding the provision of infrastructure. Approach of the Borough Council and Local Strategic Partnership to evolve a compatible vision is positive. Wishes to continue to be involved in this process. Ensure that it is referred to as the 'University of Surrey' and not 'Surrey University'.
	(d.)	Abbotswood Residents Association	As well as improving "air quality and congestion" we suggest you also refer to a need to reduce traffic noise pollution, as you do in Policy CP 6.
	(d.)	Downsedge Residents' Association	Delete 'a regional hub'. This does not add anything and its omission would 'future proof' the vision if regional planning is abandoned.
	(d.)	Member of the public	Paragraph 2 in the box relates to Climate Change but there is no previous mention of Climate Change in the document therefore earlier mention of this issue would be relevant. Suggest that reference to biodiversity should also be included in the vision.
	(d.)	Member of the public	The Sustainable Community Strategy would appear to be the proper place to put 'sustainability' issues.
	(d.)	Westborough, Broadacres & District Residents Association	Housing will "include more affordable homes". Define what an affordable home actually is in monetary terms. Affluence in Guildford makes many high priced homes affordable to many residents.
	(d.)	Woodland Trust	Pleased the protection of the countryside features in the Borough's vision, however, it is important to recognise that biodiversity does not solely reside within the 'countryside'. Urban areas often have greater biodiversity than arable land, for example, and 'aged or 'veteran' trees, which are particularly valuable for biodiversity, will also not be confined to the countryside. The vision could instead refer to the 'borough's natural environment and biodiversity' instead of 'countryside'. Equally, it would be preferable if the vision could encompass the enhancement of the natural environment in addition to its protection. It is not enough to simply protect what exists already and in many cases new habitats will need to be created in order to link existing sites ie. taking a landscape-scale approach to conservation.
	(e.)	Burpham Community Association.	It is unhelpful to refer to Guildford as a regional hub without further qualification. Given its distinctive character and geographical situation, the limits of growth need to be more clearly set out. Growth without limits being set out at this stage will lead to the destruction of the distinctive character this document sets out to maintain.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Guildford & Waverley Friends of the Earth	<p>The Borough Council and Local Strategic Partnership have evolved compatible visions to describe the type of place we want Guildford Borough to be up to 2026 and beyond: The borough will become an exemplar for sustainable development in the UK to attract the best talent and support the local knowledge economy.</p> <p>The borough's countryside, distinctive villages, rich heritage, and urban / suburban areas will be protected whilst essential new development and sustainable design is accommodated.</p> <p>Through building to the highest practicable levels of sustainable construction, reducing the need to travel through sustainable location of all new development, and improving travel options, energy use will be reduced, contributing towards the Government target of a 42% reduction in CO2 emissions by 2020 and an 80% reduction in CO2 emissions by 2050. Carbon emissions from energy use in the existing building stock will be reduced, resources including water will be used more efficiently and waste will be minimized. Air quality and congestion in the borough will also be improved.</p> <p>In order to support and attract the best talent and support the knowledge economy Guildford Borough will aim to be at the forefront of the low carbon economy, including the rural economy, and through strong links between businesses, Surrey University, and local colleges; educational excellence at all levels will be maintained.</p> <p>Housing will accommodate all ages, abilities, and lifestyles, through provision of a range of homes, and will include more affordable homes, particularly in rural areas.</p> <p>Guildford town, a regional hub, will accommodate growth, and retain its regional importance as a shopping location and central focus for integrated transport provision.</p> <p>Jobs, services, and leisure will be accessible, via improvements in public transport, including Park & Ride facilities, and safe walking and cycling facilities. Healthcare facilities will be accessible to all at a suitable local level.</p> <p>The arts will continue to develop, building on the range of venues already present and the health and well-being of communities will be nurtured.</p>
	(e.)	Guildford Environmental Forum	<p>Suggest modifying to read "Ensuring buildings incorporate the highest practicable ..." This will embrace the need to improve the energy performance of the existing housing stock, without which the government's 80% by 2050 target will not be met. Also, suggest "energy and water use will be reduced", given increasing drought and water stress in the southeast.</p> <p>Suggest "...realising potential for sustainable woodfuel and sustainable tourism based on....".</p> <p>Suggest modifying to read "energy use will be reduced in order to meet the government target of 80% reduction in CO2 emissions by 2050 at the borough level.</p> <p>Suggest insert "The borough will be at the forefront of the low carbon economy nurturing a sustainable economy, including the rural economy,..."</p>
	(e.)	Holy Trinity Amenity Group	<p>Suggest add "Jobs, services, and leisure will be accessible, via improvements in public transport,and provision of safe and attractive walking and cycling facilities." Pedestrian and cycling journeys will only be substantially increased when pedestrians and cyclists are made to feel valued, instead of being subsidiary and inferior to vehicle travellers.</p> <p>The "safe" criteria is not enough. Pedestrians and cyclists must receive priority wherever possible.</p> <p>Suggest delete "building on the range of venues already present" As it could be interpreted as there being no need to replace the Civic Hall. Suggest add "A replacement Civic Hall, or similar, will be provided and maintained for the future".</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Sport England	<p>Welcomes elements of the vision including: the promotion of access to leisure facilities by walking and cycling, and that health and well-being of communities will be nurtured.</p> <p>However, the promotion of the health and well-being of communities should be strengthened and given greater prominence within the vision.</p> <p>The vision could provide an indication of how this will be nurtured through the implementation of the relevant policies (i.e. CP17, CP18 and CP19) and the subsequent promotion of access to open space, sport and recreational provision.</p>
Guildford Town Centre Area Vision	(a.)	Guildford Society	<p>We ask for reference to the importance of ensuring that the High Street remains a vibrant focal point for the retail offer in the town and retains its character. (It is important to ensure the High Street does not become marginalised as the retail focus shifts to major new developments such as the Friary After heritage add “and landscape”.</p> <p>Propose add new bullet point: Special importance will be attached to ensuring that the height, bulk and massing of new development complements the form of the land and achieves an attractive skyline and roofscape given the distinctive topography arising from Guildford’s location in a gap in the Surrey Hills and the valued contribution to local character of views into and from the town, The preponderance of narrow routes converging to cross the Surrey Hills means that taller buildings can have an overbearing impact and will be avoided unless carefully sited to create landmarks.</p> <p>The importance of enhancing the floodplain capacity of the River Wey should also be recognised. Objectives arising from the Water Framework Directive should also be captured.</p> <p>Add “and contribute to the quality of the townscape”</p> <p>New bullet point: A link between development and SPA protection is required.</p> <p>New bullet point: A commitment to achieving air quality standards is required.</p>
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	The London Fringe which includes Guildford has a primarily ‘growth’ role, and also that Guildford is a designated ‘regional hub’ and a ‘Centre for Significant Change’. Acknowledged in the vision for Guildford Town Centre on page 18 which should positively deliver on its potential as a ‘centre for significant change’
	(a.)	Wilmslow owners of the Friary shopping centre	Supportive of the Vision for the town centre consistent with the requirements of the soon to be published South East Plan, identifies centre for significant change, acknowledges that retail and commercial offers will be enhanced and major opportunity sites will be developed.
	(d.)	Burpham Community Association.	The importance of maintaining the green belt to the north of Guildford needs to be explicitly stated. Where development does take place, the provision of supporting infrastructure needs to be recognized and allowed for in the vision statement.
	(d.)	Burpham Community Association.	Some mention should be made of the need to find creative solutions to traffic management in the town centre, particularly in the light of the impact on the A3 around Guildford when the Hind head Tunnel comes into use.
	(d.)	Downsedge Residents' Association	The wording reflects the South East Plan and should be amended if regional planning is abandoned. We think that overemphasis on retail is risky.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Environment Agency	Welcome the recognition that different areas of the Borough will have different aspirations and visions. Guildford Borough is far from homogenous, and this theme should be expanded through the GDF. We welcome recognition of the importance of the River Wey. However, believe it should be expanded to include a vision to reduce the risk of flooding for people and property. This will support the work undertaken on the Risk Reduction Measures document.
	(d.)	Member of the public	Suggest that the River Wey should be a "conservation" corridor in Guildford Town Centre as well as in the Rural Areas.
	(d.)	Surrey County Council	Would like the inclusion of: "we will support the County Council in ensuring there is sufficient, high quality, educational infrastructure to meet the needs of the increased population". We would like appended: "including sufficient educational infrastructure" to relevant bullet points
	(e.)	Holy Trinity Amenity Group	Agree; except about the statement "Guildford Town Centre will maintain and enhance its function as a transport hub and positively and sensitively deliver on its potential as a 'centre for significant change'" Suggest replace "as a centre for significant change" with "for change as required by the SE Plan". We believe that our members, and the majority in Guildford, do not subscribe to the "significant change" concept, and it should not be seen as a Guildford aspiration. Also it is better not to directly quote other policy documents; the proposed rewording will allow any changes to the SE Plan to be followed without the necessity of revising this strategy.
	(e.)	Surrey County Council	A dedicated bullet point is required in this section, making reference to the extensive and distinctive historic character of Guildford town centre, with its many listed buildings, conservation areas, and recognised high archaeological potential, that contribute so much towards Guildford town centre's identity.
Guildford Urban Area Area Vision	(a.)	Burpham Community Association.	In general this is helpful, but limits to growth of Guildford as a regional hub need to be recognized and defined.
	(a.)	Downsedge Residents' Association	Delete "its role as a regional hub for". This deletion 'future proofs' this vision if regional planning is abandoned.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Society	<p>Oppose this categorisation. Much of the land included in this so called area is garden suburb. Instead show “urban and suburban communities” based on landscape character assessment.</p> <p>We strongly urge deletion of the role of a hub here. This would duplicate the SE Plan contrary to guidance. Of far greater relevance for a local framework is the recognition in the SE Plan that Hubs will vary significantly. The distinctive qualities of Guildford might usefully be highlighted and the need to protect the special character of the established urban areas such as the garden suburbs and cohesive terraces.</p> <p>Most hub functions relate to the town centre and to direct many aspects of hub status to urban areas outside the town centre invites proposals that would be inappropriate in predominantly suburban residential areas.</p> <p>Delete continue to serve local needs and add “be enhanced to continue and strengthen their role in serving local needs and in serving as a focus for community identity”</p> <p>Same logic as applies to character of individual village settlements</p> <p>Insert “will be increased to create a” and add “and provides readily accessible recreational opportunities for each community within the borough.”</p> <p>The importance of enhancing the flood plain capacity of the River Wey is particularly important here and should be encouraged. Wildlife and landscape objectives should be included here too, not least to deliver the requirements of the Water Framework Directive.</p> <p>The need to remediate the polluted land, protect water sources, overcome traffic congestion problems in the vicinity, re-establish a functional flood plain, enhance wildlife habitat and achieve a sensitive landscape impact from this very visible site should be specified alongside the desire to further develop (as opposed to regenerate) this site.</p> <p>New bullet point: An attractive interface between the rural and urban areas and between the town centre and urban areas, including avoidance of light pollution, will be maintained to retain the sensitive juxtaposition of urban, suburban and rural that is an important feature of Guildford.</p> <p>New bullet point: A link between development and SPA protection is required.</p> <p>New bullet point: A commitment to achieving air quality standards, especially along the A3 corridor, is required.</p>
	(a.)	Woolf Bond Planning on behalf Martin Grant Homes Ltd	<p>Agree with the vision for the Guildford urban area as set out on page 18 of the Core Strategy Further Options Consultation Paper (March 2009), particularly in terms of maintaining and enhancing its role as a ‘regional hub’ for employment, housing, administrative services, transport and investment.</p>
	(d.)	Environment Agency	<p>Welcome the recognition that different areas of the Borough will have different aspirations and visions. Guildford Borough is far from homogenous, and this theme should be expanded through the GDF.</p> <p>We welcome the recognition of the importance of the River Wey. However, we believe it should be expanded to include a vision to reduce the risk of flooding for people and property. This will support the work undertaken on the Risk Reduction Measures document.</p>
	(d.)	Member of the public	<p>Suggest that the River Wey should be a “conservation” corridor in Guildford urban area as well as in the Rural Areas.</p>
	(d.)	Wanborough Parish Council	<p>The document recognizes that a large proportion of the population commutes both to London and to other areas within the south-east but the provision of local transport has not been thought through. For example the A3 and the A31 play a major role in this commuting with other key routes such as the A331 but the Borough has no control over the improvement, and therefore their ability to develop Guildford as a transport ‘hub’, as well as for retail and the projected increase in housing.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Holy Trinity Amenity Group	Agree except suggest reword from “The River Wey will be maintained and enhanced as a movement and leisure corridor” to “..as a corridor for leisure and sustainable movement”. As worded it could be interpreted as a location for additional road routes.
Ash and Tongham Urban Area Area Vision	(a.)	Barton Willmore	‘Countryside Beyond the Green Belt’ provides a sustainable and sensible location for the future urban growth of Ash and Tongham. Future urban growth in this location would be in accordance with a number of the key themes and strategic objectives of the draft Core Strategy, including: Theme 1: Managing Sustainable Growth - Ash and Tongham are well serviced centres, both suitable and able to support sustainable growth to create diverse and balanced communities. Theme 2: Place and Community – Housing development at Ash and Tongham would contribute to meeting the PPS3: Housing (November 2006) requirement for a wide choice of housing of varied types, in both rural and urban locations across the Borough responding to identified need, including the provision of affordable housing. Theme 3: Environmental Protection and Enhancement – The Thames Basin Heaths Special Protection Area (TBHSPA) impacts on much of Guildford Borough including Ash and Tongham. Some sites identified to the Council for future development are able to ‘consume their own smoke’ and provide ample Suitable Alternative Natural Green Space as mitigation for proximity to the TBHSPA. One such site adjacent to the urban boundary identified to the Council is Land South of Ash Lodge Drive, Ash and Tongham.
	(a.)	John Moore Trust	Delete final paragraph “we will seek to protect the Countryside beyond ...”

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Terence O'Rourke	<p>It has already been established, in The South East Plan, that Guildford's urban areas cannot accommodate sufficient development to meet its minimum identified development needs. Development at the edge of the existing urban areas will be necessary and is supported by the South East Plan</p> <p>The Ash and Tongham Urban Area falls within the Western Corridor Blackwater Valley sub region, as defined in the South East Plan. The strategy for this sub region, where greenfield urban extensions are required, is to "mainly focus" on the periphery of the identified hubs "but smaller allocations may be brought forward at other settlements, subject to their meeting the same sustainability considerations.". The Policy clarifies that, in such cases, incursions into the Green Belt should be minimised.</p> <p>Guildford's Core Strategy vision identifies the attractiveness of Ash as a retail and local centre. The vision in effect acknowledges that the Countryside beyond the Green Belt at Ash and Tongham could accommodate development, provided it would not harm the physical and visual separation of settlements.</p> <p>Whilst we broadly agree with this vision, given the sustainability of the Ash location, we consider that the Core Strategy should be more clear and positive, particularly in reflecting the policy requirements of PPS 3 and PPS 7.</p> <p>Relevant Consultation Questions: (a) Do you agree with the approach of the policy/section? - No</p> <p>Required Changes: The text within the Ash and Tongham Urban area vision which states "we will seek to protect countryside beyond the Green Belt from development that would harm the physical and visual separation of settlements, either within or adjoining the borough" should be amended to: "We will seek to accommodate necessary development in small sustainable urban extensions and protect countryside beyond the Green Belt from development that would demonstrably harm the physical and visual separation of settlements, either within or adjoining the borough"</p>
	(d.)	Downsedge Residents' Association	There will be significant knock on effects on Ash and Tongham if Aldershot develops into a major civilian town.
	(e.)	Environment Agency	Not clear what the sixth bullet point means. Should the environment be included in this?
Rural areas area vision	(a.)	Boyer Planning on behalf of the Diocese of Arundel & Brighton	National and regional policy supports the provision of appropriate development in rural settlements. Whilst affordable housing is likely to represent a key element of this, there needs to be scope for provision of a wider range of housing both to enhance the vitality of rural settlements and because such housing is likely to be the principal means of delivering affordable housing. National and regional policy supports this approach. Thus the wording of the second bulletpoint in this box on page 19, which refers to housing to meet local needs, must be interpreted and pursued in this way.
	(a.)	Drivers Jonas on behalf of CEMEX	CEMEX supports the general approach to development for individual village settlements. In particular, CEMEX supports the principle that rural areas should continue to be viable places in which to live and work, with a range of housing opportunities.
	(a.)	East Horsley Parish Council	We support the designation of East Horsley as a 'district centre' which will be encouraged to retain its retail offer and attractiveness as a local destination
	(a.)	Environment Agency	This seems an appropriate vision for a wide range of diverse settlements.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Shere Parish Council	Agree in general, but consider that it should be clarified whether “village settlements” refers specifically to the defined “settlement areas”.
	(a.)	Surrey County Council	It should be recognised that a village school is the heart of the community. Any policies should lead to an enhancement of the viability of educational facilities in rural settings, including villages. We should like educational infrastructure to be explicitly included in the 2nd bullet point. We would point out that educational facilities are employers, and in small communities may represent one of the largest employers in a locality and we should like this included in the 3rd bullet point.
	(d.)	Burpham Community Association.	It is not clear from the document how 'individual village settlements' are defined. The Surrey Hills are mentioned, but there is no mention of the Green Belt and this is a serious omission.
	(d.)	Downsedge Residents' Association	11/27. Rural areas. (a) We are surprised that there is no mention of the Green Belt.
	(d.)	Effingham Parish Council	This should contain clear reference to the accessibility and availability of sporting and cultural facilities for village residents. Mention should be made of the need to preserve the historic heritage to be found in rural areas, such as historic buildings and stately homes, churches, Lovelace buildings etc
	(d.)	Member of the public	There are no specific area details in the plan for development in the Guildford area. It is impossible to comment on such a general document - specific areas need to be discussed. It is not clear whether the green belt is being retained or is this going to be built upon, where are the proposed housing developments going to be built, what the time frame for building the housing developments in specific areas & what specific extra resources are planned in the light of the planned increased population in the Guildford area eg. to alleviate traffic congestion, parking inadequacy, hospital provision for increased population, NHS provision for increased population, schooling, recreation, shopping, entertainment, open spaces etc. Very disappointed in this document
	(d.)	Member of the public	Responded mentioned agricultural targets and aims that were in the now superseded Surrey Structure Plan. He said that more open space should be provided in and around Guildford town.
	(d.)	Smiths Gore	It is considered important that the potential policy clash between the requirement to protect openness within the greenbelt and the need to protect and maintain vital and sustainable rural communities, is acknowledged as a key issue for the Core Strategy.
	(d.)	Surrey County Council	Makes no mention of potential mineral working or waste development in the countryside which is a feature of the emerging Surrey Minerals Plan (SMP) as well as regional waste policy and the SWP, more specifically with respect to draft SMP Policy MA3 in relation to Eashing Farm and Surrey Waste Plan (SWP) Policies WD2 and WD5 on Wisley Airfield and Policy CW6 on development in the Green Belt. Our view is that a dedicated bullet point is required in this section, making reference to the extensive and distinctive historic character of many rural areas and settlements of the Borough.
	(d.)	Wanborough Parish Council	Agriculture does not underpin the rural economy in Guildford. It is underpinned by residents working elsewhere to where they commute. Farms tend to be owned and worked by people elsewhere who commute too.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Guildford Society	<p>Last paragraph: Surrey Hills - Add “and enhanced” after protected in line with statutory objectives.</p> <p>Fourth paragraph: In accordance with the Thames Catchment Management Plan, a strong commitment should be made to increasing the capacity of the flood plain to enable it to accommodate water that might otherwise inundate homes, especially in the town. Objectives arising from the Water Framework Directive and the Floods Directive should also be captured.</p> <p>New bullet point: Make a commitment to protecting valued wildlife habitats and in particular those protected as Sites of Special Scientific Interest and by the Habitats and Birds Directives.</p> <p>Page 20 penultimate and final paragraphs in box □ - Reference should not be made to “growth” and “regeneration and growth” roles, or to “hub” or “centre for significant change labels” without also referring to the acknowledged challenge of accommodating these without deterioration in quality of life.</p>
	(e.)	Holy Trinity Amenity Group	<p>Agree, but suggest add “Public access to the countryside will be improved, particularly where within walking distance of residential areas, to better exploit the countryside as a leisure resource.” There is a need for additional paths.</p>
	(e.)	Smiths Gore	<p>Whilst it is acknowledged that the timelines of the Core Strategy production pre-date its publication, it is nonetheless considered important that the supporting text at Paragraph 5.3 acknowledge the recently published Government Response to the Taylor Review of Rural Economy and Affordable Housing. Of particular relevance is the shift in policy focus towards targeting development where it is needed most - i.e. where it can help to sustain important and valued facilities and services within rural communities.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
Themes	(a.)	Downsedge Residents' Association	<p>Managing sustainable growth: Paragraphs 6.5-6.8 (a) Acceptable, except for: 6.5 (e) Suggest “encouraged” or “steered” instead of “directed” in second line 6.7 (e) Delete references to regional assembly and South East Plan to make this theme ‘future proof’ if regional planning is abandoned. Paragraph 6.9, Bullet points 1-8 and 12 (a) Acceptable. Bullet point 9 (a) Reference to shopping centre is risky (e) Suggest add after “shopping centre” “ adapting to meet new patterns of trading”. Bullet point 10 (a) This should be deleted if regional planning is abandoned. Bullet point 11 (a) This should include recognition of the freedom conferred by car ownership as well as the environmental disadvantages. Place and community: Paragraphs 6.10-6.12 (a) Acceptable, but in relation to “diverse and balanced communities” in 6.11, see our comments on CP 12 below. Paragraph 6.13, first bullet point. (a) This gives the impression that it will be possible to meet the housing needs of the whole community within the area of Guildford Borough. We believe that demand (which we would define to include ‘need’) will always exceed supply no matter how many dwellings are built. Second bullet point (e) Add “,suburban” after “rural”. Third bullet point (e) Delete “and best use will be made of under-utilised developed areas”. Sixth bullet point (a), (e) Suggest ending this paragraph at “facilities” as the “transport hierarchy does not make sense without a lengthy explanation of how it would work. Bullet points 4, 5 and 7-9 (a) Acceptable. Environmental protection and enhancement: Paragraphs 6.14-6.16. (a) Acceptable. Paragraph 6.17, first, third and fifth bullet points. Acceptable. Second bullet point. (a) As the wording of this bullet point is identical with that of bullet point 11 in paragraph 6.9, the same comments apply. {see paragraph II/29). Fourth bullet point (e) Unsure about the logic in this paragraph, especially as to how buildings can mitigate against drought.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Society	<p>Managing sustainable growth</p> <p>This section needs to be much more honest about use of the term sustainable and acknowledge that, given the pressures arising from existing growth levels in the borough, “sustainable growth”, judged against the five pillars of sustainable development (including respecting limits to growth), will be hard to achieve.</p> <p>Paragraph 6.7</p> <p>This paragraph captures the very difficult challenge of this Core Strategy. It seeks to turn targets that have been significantly driven by demand and growth aspirations, into allocations based on need and capacity.</p> <p>Paragraph 6.9</p> <p>Bullet point 5 - We question unqualified support for the land use requirements of educational establishments. Positive without giving carte blanche would seem more sensible.</p> <p>Bullet point 6 - Add “suburban”.</p> <p>Bullet point 7 - The highly valued relationship between the town and countryside should also be referred to and the need to maintain distinctive suburban communities with services.</p> <p>Bullet point 8 - Move “whilst” to the end of the current text and add “whilst retaining its valued historic qualities and distinctive landscape character.”</p> <p>Paragraph 7.3</p> <p>Third bullet point - Add “environmental” infrastructure.</p> <p>Fifth bullet points - Need recognition that this will require very careful planning given the scarcity of appropriate available land and the impact of effectively insatiable regional demand on provision for local needs.</p>
	(a.)	Surrey County Council	<p>The three themes have no explicit reference to waste or minerals development requirements. Consequently there is no mention of either issue in the objectives set in Section 7. The Core Strategy is therefore in danger of not providing a comprehensive statement of sustainable development requirements for other DPD’s to build on.</p>
	(a.)	University of Surrey	<p>Support the themes outlined in section 6, particularly the role outlined for the knowledge sector in the local economy and in encouraging and maintaining sustainable economic growth. Encouraged by the Council’s support for the University and it will continue to forge strong links with local regional, national and international businesses and education institutions. Encouraged by the Council’s aspiration for a borough where educational excellence at all levels is maintained through supporting the land use requirements of educational establishments. Supports the Council’s affordable housing aspirations, and the intention to meet housing needs for all sections of the community.</p>
	(d.)	Westborough, Broadacres & District Residents Association	<p>6.13 - Refers to Housing Needs and again to undefined “affordable housing”. Should question its management of the Social Housing Stock it already has. Have we ever thought of means-testing the 3 & sometimes 4 income families who live in this so-called “Social Housing”? This housing could be available to key workers by proper management & more rigorous monitoring.</p> <p>6.17 - Talks about robust flood risk reduction. No evidence of any activity geared towards the objective. The sewerage/drainage system cannot cope. Guildford is on a flood plain and the present drainage infrastructure is inadequate. Without some immediate measures to start improving it, all additional House building is going to cause tremendous problems for rainwater run-off for much of the Borough.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
Theme 1	(a.)	Barton Willmore	<p>MSG1 We support this objective. Development should be directed to the most sustainable settlements.</p> <p>MSG2 We do not object to the Council's strategy to focus development primarily within urban areas and identified village settlements. However, sustainable options for an appropriate level of development beyond existing settlement boundaries will be appropriate where insufficient land can be identified within settlements in sustainable locations.</p> <p>MSG3 We support this objective, particularly in relation to supporting services and facilities in rural centres in accordance with PPS7.</p> <p>MSG4 East Horsley which is well served by rail services and a reasonable bus service should be recognised as a suitable location for modest growth. A review of Green Belt boundaries to the north of the settlement should be completed.</p> <p>MSG5 It is important that the Council recognise the need to address both the need for affordable housing and demand for market housing within the Borough, particularly where affordability of housing is most significant. The Council's SHMA should identify where levels of need and demand for housing is most severe.</p> <p>MSG6 It would be helpful to identify specific actions which will be taken to sustain and support the Borough's economy, particularly in rural areas.</p>
	(a.)	Burpham Community Association.	The designation of Guildford as regional hub in the draft South-East Plan should not be accepted without further definition and qualification.
	(a.)	CEMEX	<p>CEMEX supports the following objectives:</p> <p>-MSG1, MSG2 and MSG5</p> <p>These objectives accord with PPS1 & PPS3</p>
	(a.)	Drivers Jonas on behalf of CEMEX	In relation to the strategic objectives for Theme 1 CEMEX supports the following objectives MSG 1,2 and 5. These objectives accord with Planning PPS1 which promotes new development near existing infrastructure and services and PPS3, which requires Councils to consider need and demand when distributing affordable housing.
	(a.)	Environment Agency	Welcome the continuation of the distinction between Guildford Town Centre and the rural areas, but note that there is no mention of Ash and Tongham in this section.
	(a.)	Environment Agency	Welcome the objective to direct development to the most sustainable locations, and that this will be supported by infrastructure throughout the plan.
	(a.)	Guildford Business Forum	Supports themes, particularly in encouraging and maintaining sustainable economic growth. Encouraged by the Council's aspiration for a borough where educational excellence at all levels is maintained. Supports the aspiration to educational excellence at all stages of education, and considers that teaching and support facilities for staff and pupils/ students should be of a high quality commensurate with this.
	(a.)	Highways Agency	Supportive of the strategic objectives listed under this theme particularly MSG4. Objective MSG1 is also supported as it will encourage development in locations that will already have some provision in terms of sustainable transport facilities. Prefer that developments are concentrated in urban areas close to existing transport hubs. This approach would provide the greatest potential to meet the objectives of PPG13 and could therefore be expected to minimise the impact on the SRN within Guildford.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Highways Agency	Full consideration should be made of the need to carefully consider the location and size of residential development in relation to employment and other service provision. It is also important to consider the rate at which development comes forward and the phasing of such development. Care must be taken to ensure that there is not an over provision or imbalance of either residential or employment development as this may result in an increase of in and out commuting levels. It will be essential that the appropriate level of sustainable transport infrastructure comes forward in a timely manner to support the growth. Supportive of the access to alternative modes of transport to the car and the significant role this will play in the provision of transport access. Also supportive of the inclusion of travel plans into future developments and recommends that existing developments are encouraged to take up voluntary work place travel plans.
	(a.)	Member of the public	The theme is fundamentally flawed. A vibrant economy will not continue to develop in the period to 2026. The strategy must rethink the situation where lack of funding and investment will impact the MSG's. The 'smart growth' concept is not sustainable. The reference to office and retail space does not reflect the current situation where many retail and office vacancies are vacant.
	(a.)	Shalford Parish Council	Commitment to 'maintaining our distinctive rural villages....whilst ensuring these retain the local services essential to be living and working places'
	(a.)	Solum Regeneration Partnership	(table after paragraph 6.9) Object - Supports the focus on Guildford Town Centre we consider the benefits of the redevelopment of land at Guildford station are not conveyed in the 'sustainable growth' of Guildford. At the penultimate bullet point the text should be reworded to state: "Transport, and the enhancement of Guildford Station through its redevelopment, will play a significant role in this, through excellent access..."
	(a.)	Surrey County Council	Para. 6.9 The 8th bullet point should be amended to "new development including educational infrastructure to meet the changing demands...". Heritage Issues ,Para. 6.9 - a dedicated bullet point is required in this section, making reference to the ongoing protection and enhancement of archaeological sites and monuments, listed and other historic buildings, parks, gardens and landscapes within the managed growth of the Borough.
	(a.)	The Clandon Society	6.6 This is currently at best creaking under pressure and at worst failing completely. Before any more development of any sort is even considered proper planning to update and enhance the existing infrastructure must be a priority. Sewage and flooding problems in the Clandons.
	(d.)	Guildford Environmental Forum	Bullet point 6: Park & Ride sites facilitate car use, and although they reduce town centre congestion this is at the expense of higher traffic through rural and connecting roads and higher green house gas emissions. Cannot support the provision of additional P&R sites. Suggest a new bullet point "A premium levied on all car park charges will be hypothecated to help pay for improvements in public transport, cycle paths and footpaths to offset the higher transport emissions caused. We understand Woking have already set a precedent for hypothecation.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	At paragraph 6.5 on page 20, fails to make these big decisions about where new development will go. fails to support more sustainable patterns of housing through sensible location of development. Evidence base published to late to base the amounts of new development required Concerns raised In order to answer the question posed at paragraph 6.9: 'what will this mean in practice?' Highlighted failings in MSG 1, MSG 2, MSG4, MSG5 & MSG6 Strategic objection MSG1 does not in fact identify sustainable locations. The response to locate all future development in the Town Centre will not meet this objective, nor will it meet the objectives in MSG2 to identify strategic development sites or EPE2 to make the best use of previously developed and/or under used land. Surrey Police HQ and the College of Law identified as a strategic development site.
	(d.)	Smiths Gore	There is no policy that focuses on the particular characteristics of the rural economy and the requirement, as set out in PPS7, for policies which seek to target development into communities that are currently well served by facilities or services, or which can assist the the protection and enhancement of such facilities.
	(d.)	Terence O'Rourke on behalf of Wharf Land Investments (Jersey) Ltd.	Paragraph 6.9 stipulates that "The rural economy will be nurtured and diversified, invigorating the countryside areas of the borough. Together these steps will ensure we are well-positioned to sustain economic success in the future." Such objectives support the Rural Area Vision goal. In order to balance the requirements of sustaining the rural economy against the maintenance of key landscapes, areas not contributing to purpose of including land within the Green Belt and not adversely impacting on its use thereafter should be considered for development. The Guildford Core Strategy must recognise this point through inclusion of specific policies that could be used to support economic development in suitable locations, such as WA. A new policy should be created in relation the rural economy which includes the text: "Development of suitable previously developed Green Belt sites, where very special circumstances can be proven to exist, will assist in the support and revitalisation of the rural economy" Themes section (pg21) stipulates that "We envisage a borough where educational excellence at all levels is maintained through supporting the land use requirements of educational establishments." Many new educational institutions may require a peripheral location where sufficient space is available to construct a purpose built campus. This should be established in policy. The following wording should be included in a new policy: "We envisage a borough where educational excellence at all levels is maintained through supporting the land use requirements of educational establishments on urban and Green Belt sites, presuming very special circumstances can be proven to exist in the latter instance, which warrant development occurring."
	(d.)	The Clandon Society	6.9 This takes account of "the rural economy" but no where in the whole document is the need for enhanced food production recognised. The strategy needs to give greater consideration to the need to retain land for food production.
	(d.)	Wanborough Parish Council	Page 21 7th bullet point. It is more a question of 're-establishing' rather than 'retaining' local services.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Guildford & Waverley Friends of the Earth	<p>Paragraph 6.9 Bullet points 5 and 6/MSG2/paragraph 6.13 bullet point 3/ and policy CP13 (rural exception sites): These policies are linked. We agree affordable and low-cost market housing is urgently needed in rural areas so people working in the rural communities are not forced away from their place of work (6.13 bullet point 3) but we think that GBC is being unrealistic in expecting that this can be provided with no impact on landscape and countryside whatsoever (paragraph 6.9 bullet point 5 and 6). Sections of the document as currently drafted are inconsistent with each other and will lead to uncertainty. □</p> <p>MSG2: also refers to containing “growth primarily within existing, well-serviced urban areas and identified village settlements, through strategic development sites and targeted regeneration.” 6.13 Bullet point 5 is another example of the same issue.</p> <p>The concept of the rural exception site and the themes running through the recent Taylor report and the government response need to be picked up and incorporated into policy. The impact of new housing in rural areas needs to be minimized, but impact cannot be avoided altogether. This needs to be recognized in this document so that some new housing is actually provided in rural areas where there is a need.</p>
	(e.)	Guildford & Waverley Friends of the Earth	<p>Changes to the Themes will need to be applied throughout the document.</p> <p>Theme 1 - Managing sustainable <i>development</i></p> <ul style="list-style-type: none"> •MSG2: Contain <i>development</i> primarily within existing, well-serviced urban areas and identified village settlements, through strategic development sites and targeted regeneration. •EPE1: Protect the countryside from inappropriate or unsuitable development, <i>including agricultural land suitable for food production</i> maintain its rural character, the identities of and open separation between settlements. <p><i>EPE5 Promote the sustainable use of natural resources; and ensure that planning decisions assist in the prudent and sustainable use of finite natural resources;</i></p> <p><i>EPE6 Meet the challenge of climate change and minimise the impact of all development on the natural environment</i></p>
	(e.)	Guildford Environmental Forum	<p>6.17 First bullet suggest “significant reductions in energy and water use,...”. Also suggests following the reference to 80% reduction by 2050 with “including energy reductions in existing buildings”.</p>
	(e.)	Guildford Environmental Forum	<p>Suggest an additional objective to adequately address the triple threats of Peak Oil, Climate Change and food security. Reasons given.</p> <p>Suggest a bullet point saying “Peak Oil is expected to occur before 2026 and reducing dependency on fossil fuels is necessary for sustainable growth”. Also, we are very dependent on imported food and spare capacity in global food production is dangerously low and falling. To address this risk in the strategy we would like a bullet point saying “Agricultural land close to settlements will be safeguarded and areas provided for communities to grow their own food”.</p>
	(e.)	Guildford Environmental Forum	<p>Change to last bullet point: “Introducing green travel plans across the borough will....” Like the concept of travel plan zones where new developments will trigger a group of adjacent businesses (including schools) to work collaboratively on a zone travel plan.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Holy Trinity Amenity Group	Agree, except that the following needs to be added: Action will be taken to mitigate the potential degrading effect of increasing the density of both residential and commercial building. This is by far the biggest challenge facing Guildford and positive policies are needed to address it, and to ensure truly sustainable growth. Loss of quality must be minimised, this must be an essential part of theme 1. Action will be taken to avoid new development spoiling the distinctive character of the town, particularly its historic areas and its setting in the local topography. This is the special quality that the town provides to local residents and to the region. Action will be taken to ensure that the town centre provides the comprehensive range of shopping and services needed to meet all the day to day needs of present and future local residents, and thereby to avoid car journeys to out of town facilities. This includes the restoration of convenience shopping facilities. The continual shrinkage of convenience shopping is a major problem that must be tackled.
Theme 2	(a.)	Barton Willmore	PC1 - The Council should ensure that rural communities are not overlooked when exploring opportunities to maintain and deliver improved services and facilities, and green infrastructure. PC3 - The Council should consider favourably proposals which can deliver improvements to publicly accessible parks and open spaces including SANG as part of a development package. PC4 - We support this objective which reflects national guidance in PPS7. PC6 - Publicly accessible green spaces are recognised as a key component in improving quality of life.
	(a.)	Environment Agency	The objective to protect environmental assets is supported, although protection should be accompanied by enhancement.
	(a.)	Guildford Business Forum	Supports the Council's affordable housing aspirations, and the intention to meet housing needs for all sections of the community. Emphasises the requirement for the provision of affordable housing within the borough . The final Regional Spatial Strategy for the South east published today recommends 35% affordable rather than the 40% the Council proposes.
	(a.)	Guildford Cathedral	The dean and chapter support the themes outlined in section 6, particularly the councils affordable housing aspirations.
	(a.)	Guildford Constituency Labour Party	Bullet Point 6 “.....excellent network of safe walking and cycling facilities”, change to: “excellent network of pleasant, convenient and safe walking and cycling facilities” (b)Another point should be added. “Walking greatly promotes social interaction and health. In addition to the provision of pleasant convenient and safe walking and cycling routes, Home Zones will be promoted and 20mph speed limits introduced in residential areas”
	(a.)	Guildford Society	Para 6-13 – first bullet point in Vision – Line 3 – delete “through the right range of dwelling sizes” Insert “through an appropriate/compatible range of dwelling sizes”.
	(a.)	Highways Agency	Supportive of improvements in public transport that will assist in promoting a sustainable transport hierarchy and encourage the use of alternative modes to the car.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	<p>Paragraph 6.70, statement is supported. Both the Surrey Police Authority and the College of Law actively seek to work with the Council in order to provide a policy framework which can assist both organisations in continuing to play an important role within the Borough.</p> <p>At paragraph 6.11 based on the Council's own independent evidence in the Strategic Housing Market Assessment, the first of these objectives will not be achieved. More importantly the provision of a "range of homes" to meet the needs of the "whole community" will not be achieved.</p> <p>Housing needs of all sections of the community will not be met, as evidenced in the results of the Strategic Housing Market Assessment.</p> <p>Page 25, the strategic objective PC1 will be undermined.</p>
	(a.)	Surrey County Council	<p>Education is invisible in this section. We should like reference to the importance of Early Years and School facilities to be acknowledged in para. 6.11 as well as a bullet point in para. 6.13 indicating its importance to a community and how GBC will work in partnership to ensure high quality educational infrastructure is provided.</p> <p>Para 6.13. 6th bullet point. We would like the need to travel to Early Years Settings and schools to be stated as community facilities that need accessible travel.</p> <p>Supports para 6.17</p> <p>Para 7.3 MSG3. We SUPPORT a policy of ensuring educational infrastructure is provided by developers, as in Policy CP5. We should like "educational infrastructure" to be explicitly stated.</p> <p>Also, PC6. High quality educational facilities i.e. Early Years and Schools contribute to the quality of life and economic well-being of residents and are a key element. We would like it explicitly included, e.g: "Ensure provision of the educational, social, cultural . . . "</p> <p>Heritage Issues - Para. 6.13 (Themes - Place And Community) - a dedicated bullet point is required in this section, making reference to the ongoing protection and enhancement of archaeological sites and monuments, listed and other historic buildings, parks, gardens and landscapes within the managed growth of the Borough.</p>
	(a.)	The Theatres Trust	<p>Item 7.3 on page 25 - PC1 to improve access to community facilities. Cultural services play a crucial role in tackling social inclusion, contributing to regeneration, promoting safer communities, encouraging healthier lifestyles, providing opportunities for voluntary and community activity and stimulating lifelong learning.</p>
	(d.)	Holy Trinity Amenity Group	<p>Suggest add another point: It is recognised that walking to make day to day journeys, as well as for leisure, greatly promotes social interaction and community identification. Improved facilities, including 20mph limits in urban areas, and Home Zones, will encourage this.</p>
	(e.)	Guildford & Waverley Friends of the Earth	<p>Amended text: PC7 Enhance the fabric and use of existing buildings, their contribution to sustainable development and the needs of the Borough and adapt them to meet the demands of climate change and reduce their energy use and CO2 emissions.</p>
	(e.)	Sport England	<p>Supports the nature and range of strategic objectives under the 'Place and community' theme. Request that 'sport' is added to the list of provision under objective PC1 alongside recreational, leisure and green space.</p>
	(e.)	Woodland Trust	<p>Para - 6.13 Advise against using the word 'countryside' and instead use 'natural environment and biodiversity' since the former implies urban green spaces and biodiversity are not an asset.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
Theme 3	(a.)	Barton Willmore	EPE1 This objective should not preclude the release of a limited amount of land from the Green Belt for housing in sustainable locations and where it is needed in order to meet the minimum housing requirement for the Borough. EPE2 In accordance with PPS3, the efficient use of (previously developed) land needs to be balanced with delivering high quality and well designed places. EPE3 The Council should explore opportunities for land to be added to the Green Infrastructure in the Borough. A principal component of this will be the identification of SANG through the Council's SPA Avoidance Strategy. EPE4 We support this objective which is embedded in national and regional policy.
	(a.)	Drivers Jonas on behalf of CEMEX	In relation to the strategic objectives for Theme 3 'Environmental Protection and Enhancement', CEMEX urges the Council to consider the development of greenfield land, and in particular Green Belt land, in areas where it would be sustainable, i.e. adjacent to an existing settlement where it would act as a natural, sustainable extension. The revision of the Green Belt boundaries is supported by PPS3 which recognises a need to explore a range of options for distributing housing, including the review of any policy constraints.
	(a.)	East Guildford Residents Association	Flooding, Para 6.17 - talks of robust flood risk reduction and mitigation measures being needed. It is vital that this aspect be kept to the fore.
	(a.)	English Heritage	Para. 6.14 refers to the value of nationally important landscapes, habitats and built heritage and the need for responsible management. Given the status of the development plan in decision making, an appropriate policy framework provides an important basis upon which to manage, although this should recognise the contribution of the wider historic environment, the locally important, and not just those features of national importance. Para. 6.15 specifically states that the strategic objectives and core policies under Theme 3 are based upon 'proactively planning for the protection and enhancement of our environmental and historic assets'. The paragraph continues with reference to benefits for biodiversity, recreational opportunities etc., but nothing in relation to the historic environment. The historic environment does not feature in the blue highlighting associated with para. 6.17 and yet it is part of the overarching Vision; the key issue identified earlier and strategic objective EPE4.
	(a.)	Government Office for the South East	Discussed potential presentation approaches to strategy / policy regarding the Borough's environmental assets and the related role of sustainability appraisal in protecting these. The Core Strategy could highlight areas in which no major change is anticipated.
	(a.)	Guildford Business Forum	Supportive in principle. Will comment later on concerns about imposing standards over and above current building regulations requirements on new build.
	(a.)	Guildford Constituency Labour Party	Policy MSG4 - Amend "accessible to safe pedestrian or cycle routes" to "accessible to safe pedestrian and cycle routes" Cycling and walking are not necessarily direct substitutes. Mostly it will be the case that walking is more suitable for shorter journeys, whereas cycling will be more suitable for longer journeys. Hence both should be provided
	(a.)	Guildford Environmental Forum	(Paragraph 6.15) The reference to increasing biodiversity is welcomed.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Society	<p>Each of the Strategic Objectives relating to Environmental Protection and Enhancement, as set out on page 111 and part of page 112, seem to be very commendable. The problem comes with the wording of many of the related Core Policies which are designed to “deliver” the strategic objectives.</p> <ul style="list-style-type: none"> • Strategic Objective EP1 <p>Policy CP1 – There is potential for conflict between EP1 and CP1 Policy CP1 sets out the policy for Green Belt land and that part of the policy is supported. Policy CP23 – We object to the wording of this policy which includes the following statement: “Support provision of suitably located sustainable development necessary to facilitate the environmental, economic and social well being of the AONB and its communities;” Potentially this section of the policy could, and would, be used to justify all sorts of inappropriate development within the AONB. This wording is dangerous and should be deleted from the policy Policy CP27 – We support this very good policy.</p> <ul style="list-style-type: none"> • Strategic Objective EP2 <p>Policy CP1 - The wording contained in Strategic Policy EP2 – “...while protecting the distinctive character of the built-up areas” – should be inserted in Policy CP1 and for it to read: “Development should seek to make full use of all available previously developed land while protecting the distinctive character of the built up areas before the use of greenfield land will be considered.” Policy CP11 – A similar, but extended, qualification to the above in respect of Policy CP1 should be inserted :- “In order to support housing supply, new residential development will be required to make the most efficient use of suitably located land. In the consideration of planning applications, particular account will be taken of: local context and the density and distinctive character of the immediate area; the need to reinforce local distinctiveness; on-site constraints, including land levels and natural features, such as trees; the capacity of the local infrastructure, including the local road network; the size and type of homes (flats or houses); the residential amenities of the occupants of both existing and proposed new dwellings; accessibility to public transport.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>It might be better for the reference to residential density "...will normally be no lower than 30dph" to be in the supporting text.</p> <p>We object to the following part of the policy which specifies locations where "highest densities" will be permitted. Not every location within Guildford Town Centre or within 500m walking distance of a train station will be suitable. Finally in respect of this policy, for the same reason that it makes it difficult to resist unsuitable developments, we object to the inclusion of an indicative maximum density (of 150dph).</p> <p>Policy CP16 – Appears to be very good.</p> <ul style="list-style-type: none"> • Strategic Objective EP3 <p>Policy CP11 - See comments above under Strategic Objective EP2.</p> <p>Policy CP23 - See comments above under Strategic Objective EP1.</p> <p>Policy CP25 – This policy is very good. It's clear and unambiguous.</p> <ul style="list-style-type: none"> • Strategic Objective EP4 <p>Policy CP3 – Policy CP3 does not have relevance to Strategic Objective EP4. More jobs results in a demand for more housing, adds more pressure on transport and other infrastructure all of which impacts more on the environment in general. No development can "promote" the use of public transport. It can, at best, "facilitate" its use by reason of its proximity to bus and rail services. What this policy could and should say (but does not), is that in order to help to reduce travel by car and to promote the use of public transport, proposals for employment generating development which are located remote from ready access to public transport will not normally be permitted.</p> <p>Policy CP6 – All good, but unrealistic, aspirations. Policies CP11, 16 and 23- All the subject of comment above.</p> <p>Policies CP18, 24 and 26 - Support</p> <p>Policy CP20 – All good aspirations. But questionable in successful implementation.</p> <p>Policy CP22 - The policy should include a commitment to taking full account of the Thames Catchment Flood Management Plan by ensuring development is consistent with, and as appropriate helps to deliver, the objectives for this part of the Thames Catchment, in particular enhancing the capacity of the floodplain outside built up areas. .</p>
	(a.)	Highways Agency	Supportive of strategic objectives EPE1 and EPE2. These will ensure there is no ad-hoc infilling of the green belt resulting in development in areas with limited access to sustainable transport modes and which, therefore could result in higher levels of car usage and impacts on the SRN across the district.
	(a.)	Highways Agency	Supportive of the commitment to proactively deal with congestion through the access to alternative modes of travel to the car.
	(a.)	Member of the public	6.3 Theme 3 is welcomed.
	(a.)	Member of the public	Para 6.17, Object - Some of the criteria are inappropriate for a spatial plan.
	(a.)	Natural England	Support the strategic objectives under theme 3
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	Objective EPE2 is supported. In order to assist in achieving this, a positive policy framework should be provided for the Surrey Police HQ and the College of Law campus which both fit these criteria. This would also support objective EPE4 (page 25).
	(b.)	CEMEX	Urges the council to consider the development of greenfield land, and in particular greenbelt land, in areas where it would be sustainable, i.e. adjacent to an existing settlement where it would act as a natural, sustainable extension.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Abbotswood Residents Association	Paragraph 6.17. The next to last bullet point ("Transport will play...") should include a reference to reducing traffic noise pollution.
	(d.)	Environment Agency	Theme covers a wide variety of environmental issues . Welcomes the inclusion of flood risk, reduced CO2 emissions and sustainable development. The section does not mention biodiversity, for which several policies are included in the Core Strategy. Although the reference to, 'working to robust flood risk reduction and mitigation measures' in the grey box, is good, we believe it would be better as: - "working to reduce flood risk using robust flood risk reduction and mitigation measures". Water resources, along with CO2, are also a major problem in the South East, and, through the Code for Sustainable Homes and BREEAM, we will be seeking reductions in water use. The impacts of climate change will make this situation worse in the future, and adapting our water usage will become increasingly important in the future.
	(d.)	Environment Agency	Minimising the impacts of development on the natural environment is not strong enough to achieve sustainable development. PPS1, PPS9 and PPS25 all promote improvements on the natural environment.
	(d.)	Holy Trinity Amenity Group	Agree, but need to add: Positive action will be taken to preserve and enhance the environmental assets of the Borough, including the built heritage.
	(d.)	Member of the public	Responded mentioned woodland protection policies in the now superseded Surrey Structure Plan, he also mentioned trees ability to absorb c02 and other pollutants."A tree should be planted for every tree cut down".

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Woodland Trust	<p>Para 6.17. The following parts of the Borough's vision identified in 6.17 make little if any mention of the natural environment. Indeed the main thrust of this theme seems to have been overlooked in 6.17. Would like to see the inclusion of at least one point that relates specifically to protection and enhancement of the Borough's natural environment and biodiversity. Concerned that the distinction between climate change mitigation measures and adaptation measures is not clear enough in 6.17. The two are bundled together in a rather confusing manner in this section and we would recommend that they are clearly separated and defined. No mention of how the natural environment can contribute to mitigation nor are there any measures designed to help the natural environment adapt to climate change. Believe this is a major omission.</p> <p>In the case of mitigation, woodland's act as a carbon sink for CO2 emissions. In addition, woodland can assist in control of flood run-off, provide shade in hot temperatures and offer biodiversity refuges for species under pressure from the rise in temperatures. 10% increase in the amount of green space in built-up areas would reduce urban surface temperatures by as much as 4%. In terms of adaptation, climate change is the biggest threat faced by biodiversity and action to enable it to adapt will therefore be key to future delivery of Section 40 of the Natural Environment and Rural Communities Act 2004. Defra's Guidance for Local Authorities on Implementing the Biodiversity Duty (May 2007) specifically states that: 'Conservation of biodiversity is vital in our response to climate change and in the delivery of key ecosystem services such as food, flood management, pollination and provision of clean air and water'. In their current state, key habitats are simply not sustainable given their fragmented character and the immobile nature of many of their characteristic species. Adaptation is, therefore, about developing resilient natural systems that can absorb and respond to change.</p> <p>The council need to identify areas for new green space and woodland creation to help mitigate the effects of climate change and also to help semi-natural habitats and species adapt in response to climate change. In the case of woodland, action should focus on reducing negative edge effects from surrounding intensive land-use and buffering and extending existing valuable habitats such as ancient woodland.</p>
	(e.)	Guildford & Waverley Friends of the Earth	<p>PC7 Enhance the fabric and use of existing buildings, their contribution to sustainable development and the needs of the Borough and adapt them to meet the demands of climate change and reduce their energy use and CO2 emissions"</p> <p>EPE4: Ensure new development is well located, planned, designed and constructed to the highest standards, to minimise impacts upon the historic and natural environments and climate change and to respond positively to the challenges these bring.</p> <p>EPE5 Promote and the sustainable use of natural resources and the minimisation of waste; and ensure that planning decisions assist in the prudent and sustainable use of all natural resources;</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Guildford & Waverley Friends of the Earth	<p>The Borough will be in a strong position in its shared response to the effects of climate change. Innovation and technical excellence in design and construction will be encouraged.</p> <p>Transport will play a significant role in this, through excellent access to alternative modes of travel to the car.</p> <p>Sustainable and low carbon communities will contribute towards the Governments target of an 80% reduction in CO2 emissions by 2050.</p> <p>Need to ensure that new developments are built to high environmental standards. Incorporating green travel plans into future developments will also contribute towards reducing CO2 emissions, achieving safer, cleaner, greener communities and reducing</p>
	(e.)	Guildford & Waverley Friends of the Earth	<p>Amended text</p> <p>EPE1: Protect the countryside from inappropriate or unsuitable development including agricultural land suitable for food production , maintain open rural character, the identities of and green separation between settlements.</p> <p>EPE2: Meet the challenge of making the best use of previously developed and / or under used land while protecting the distinctive character of the built-up areas.</p> <p>EPE3: Improve environmental quality, protect and enhance the distinctive natural and built landscapes and important habitats of the Borough’s countryside and urban areas.□</p> <p>EPE4: Ensure new development is well located, planned and designed, and constructed to the highest standards in order to minimise impacts upon the historic and natural environments and climate change, to minimize water consumption and to respond positively to the challenges these bring”</p> <p>EPE5 Promote and the sustainable use of natural resources and the minimisation of waste; and ensure that planning decisions assist in the prudent and sustainable use of all natural resources;</p>
	(e.)	Surrey County Council	<p>Heritage Issues</p> <p>Para. 6.17 (Themes - Environmental Protection And Enhancement) – a dedicated bullet point is required in this section, making reference to the ongoing protection and enhancement of archaeological sites and monuments, listed and other historic buildings, parks, gardens and landscapes within the managed growth of the Borough. It should highlight the sensitive reuse of historic buildings as a form of sustainable development, recognising the long-term 'carbon capture' that historic buildings represent and the possibilities for the enhanced energy efficiency of such buildings.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
Strategic objectives	(a.)	Downsedge Residents' Association	<p>Comments apply to Strategic objectives wherever they appear in the Consultation Document.</p> <p>Managing Sustainable Growth MSG1 and MSG 4 (e) Replace references to “directing” development “with “encouraging” or “steering” or similar. [see paragraph I/14, first bullet point, of these comments]. In MSG 4 add “and improved” after “safe”.</p> <p>MSG 2. (a) Acceptable.</p> <p>MSG 3 (e) Delete “when required”. Because of the existing infrastructure deficit all growth will require enhancement of the existing infrastructure.</p> <p>MSG 5. (a) As already noted [see paragraphs I/16 and II/31 of these comments] it is unrealistic to expect Guildford to meet the housing demands of “the whole community” In relation to “diverse and balanced communities” see our comments on CP10 below. (e) Delete “and the requirements of the regional special strategy” in order to ‘future proof’ this objective.</p> <p>MSG 6. (a) In the interests of ‘future proofing’ replace “London Fringe and Western Corridor Blackwater Valley sub-regions” with “surrounding areas”.</p> <p>MSG 7. As already noted the emphasis on retail is risky. Suggest add after “county ”,adapting as trading patterns change”.</p> <p>Place and community PC 1-PC 6 (a) Acceptable. PC 7 (e) After “fabric” add “curtilages”. It is not just the building that matters but also its surroundings.</p> <p>Environmental protection and enhancement EPE 1, and 4 (a) Acceptable. EPE 2. (a), (e) This needs rethinking to avoid wording “best use of previously developed and/or underused land” which is an incitement to ‘garden grabbing’. EPE 3. (a), (e). After “countryside” add “suburban”.</p>
	(a.)	East Guildford Residents Association	Infrastructure and sustainability is frequently mentioned in the Consultation. It is vital that Infrastructure is in place or firmly committed when significant development is contemplated.
	(a.)	Government Office for the South East	A Core Strategy needs to clearly define its strategic objectives, what it intends to deliver for the borough, in terms of housing, other growth in key areas of change and elsewhere.
	(a.)	Guildford Business Forum	<p>Support the strategic objectives, particularly those relating to managing strategic growth and developing the knowledge based economy. Encouraged by strategic objective MSG3. Is concerned about the current level of infrastructure provision throughout the Borough - particularly in West Guildford.</p> <p>Concerned that there is inadequate attention to public investment in road infrastructure to solve existing problems of congestion at peak times, and would wish to see the Core Strategy recognise and address this issue as an urgent requirement.</p> <p>In the villages and other rural parts ditches and culverts form a major part of the drainage infrastructure of the borough and it is important that these are protected and maintained to prevent flooding. Developers should be required to carry out and submit detailed topographical/drainage studies and proposals to ensure that the development in question does not cause or exacerbate flooding.</p>
	(a.)	Guildford Cathedral	The dean and chapter support the strategic objectives outlined in section 7, particularly those relating to place and community.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Member of the public	Para 7.3, MSG 7, Object - Topography suggests that reinforcement of Guildford as a preferred location will be difficult, and sub-regional strategies should spread the increase in facilities around elsewhere.
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	Paragraph 7.1 to "sustainably" deliver development will not be met. The claim in paragraph 7.2 that the objectives have been informed by evidence base research is untrue (see SHMA).
	(a.)	Surrey County Council	As a Core Strategy DPD, site allocation proposals would be the exception. The three themes (Section 6) have no explicit reference to waste or minerals development requirements. Consequently there is no mention of either issue in the objectives set in Section 7. The Core Strategy is therefore in danger of not providing a comprehensive statement of sustainable development requirements for other DPD's to build on.
	(a.)	University of Surrey	Supports the strategic objectives, particularly those relating to managing strategic growth and developing the knowledge based economy. However, is concerned about the current level of infrastructure provision in the West Guildford area where it is located, specifically in relation to transport. Encouraged, up to a point, by strategic objective MSG3 which seeks to ensure that development is fully supported. Concerned that there is inadequate attention to public investment in road infrastructure to solve existing problems of congestion at peak times.
	(d.)	Holy Trinity Amenity Group	MSG4. Add "and accessible to safe, convenient and attractive, pedestrian or cycle routes, to improve accessibility and reduce vehicle congestion." Provision of merely safe routes will not be sufficient to increase walking / cycling as a means of transport. MSG 7: Add: Restore adequate provision of convenience shopping to meet the needs of the growing town centre population who are not expected to have to make car journeys to out of town shopping. Add PC8. Promote social interaction and community identification by improving pedestrian facilities and creating "Living Streets".
	(d.)	Westborough, Broadacres & District Residents Association	PC3 - Despite consultations about Site Allocations, valuable amenity spaces such as the Aldershot Road Allotment Site (aka Westborough Allotments Site) remains under threat of Housing Development, despite massive local public support for keeping the whole site as Allotments. PC6 - Seems completely at odds with the present reality in Worplesdon & Westborough. EPE2 - refers to making the best use of previously developed or under-used land. Where does that place the Aldershot Road Allotment Site?
	(e.)	Guildford & Waverley Friends of the Earth	Managing sustainable <i>development</i> * new MSG2 contribute to meeting targets for greenhouse gas emissions through provision of development which will assist in meeting Government targets MSG2: Contain <i>development</i> primarily within existing, well-served urban areas and identified village settlements, through strategic development sites and targeted regeneration. MSG3: <i>Ensure</i> development is fully supported, when required, by strategic and local, physical and social infrastructure throughout the plan period.
	(e.)	Ockham Parish Council	7.1 - from near the end of line 2 suggest amend to read:"spatial strategy: sustainably and sensitively to deliver development in the future, to meet...up to 2026. The objectives seek to encompass all the aspects of spatial change for which the Borough needs to prepare." 7.2 - line 4 - do you mean "evidence-based research"? If so, what other research is there which is not evidence-based? Suggest omit "evidence-based".

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Surrey County Council	Heritage Issues - Para. 7.3 – a dedicated bullet point is required in this section, making reference to the ongoing protection and enhancement of archaeological sites and monuments, listed and other historic buildings, parks, gardens and landscapes within the managed growth of the Borough. Such a bullet point should highlight the sensitive reuse of historic buildings as a form of sustainable development, recognising the long-term 'carbon capture' that historic buildings represent and the possibilities for the enhanced energy efficiency of such buildings. Para. 7.3 - Policy PC3 should be revised to include reference to protection of the historic environment.
CP1	(a.)	Barton Willmore	Should identify East Horsley as a major rural centre, above all other “identified village settlements”.
	(a.)	Barton Willmore	Support that Green Belt land should be protected from inappropriate development unless very special circumstances allow.
	(a.)	Carter Planning Limited	No
	(a.)	CEMEX	Urge the council to consider removing selected areas of land from the green belt where they would act as natural extensions to existing settlements
	(a.)	CPRE Surrey Branch Guildford	Object to the word “growth” in this policy title and recommend use of the word “development” instead, as used in the Local Plan and the Preferred Options document. We have consistently objected to the name “London Fringe” being used to describe the sub-region including Guildford, with its implication of urban sprawl from the capital spreading into Surrey. We see no reason why term should be included in the policy, especially as the town is supposed to be a Regional hub in its own right, but is also identified as the SE Regional capital where both GOSE and SEEDA have their offices. No definition is provided for “sub-region” presumably because the new SE Plan has not yet been published and draft policies still have weight. Support development being located on previously developed land within the urban area of Guildford, and at the much smaller and distinct settlements of Ash and Tongham. No definition is, however, provided for “urban area”. We note that there is a definition provided for “town centre” and “regional hub” and that the maps on pages 26 and 27 help to clarify these terms for the town of Guildford. We object to the phrase “in accordance with the sequential settlement hierarchy set out in the supporting text below”. The sequence of villages shown is in alphabetical order and has no relevance to development priority. We consider that the reference to the Green Belt is inadequate. In our view it should be made clear in policy CP1 that PPG2 is still national policy and its purposes and uses listed. The Green Belt is critical to the location of development at Guildford because of its role of restricting urban sprawl, safeguarding the countryside from encroachment, preventing neighbouring towns from merging into one another, preserving the special character of historic towns, and assisting urban regeneration. There is no definition given for a “Centre for Significant Change”, a description that applies to Guildford, but not to the whole District. Significant change has already taken place at Guildford with the arrival and expansion of the University, but whether future change will include overcoming infrastructure deficit, and the completion of delayed projects that are still outstanding is not apparent. This policy should include a reference to the word “sustainable”. The underlying reason for locating development in the urban centres is their proximity to employment, transport services, and health, retail and recreational facilities. One major objective is to reduce car usage. It is odd that in the Preferred Options document this is covered so comprehensively whilst this topic is left out of the new policy.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Cranleigh Road Area Residents Association	Requires definition of Guildford Town Centre Oppose reference to regional hub.
	(a.)	Downsedge Residents' Association	<p>Although we are happy with the general thrust of this policy we are not happy with the wording. We suggest it be amended to remove reference to: regional hub, sub regions and the sequential hierarchy. The reasons for this suggestion are to make this policy future proof if regional planning is abandoned, and the impracticality of a settlement hierarchy for development.</p> <p>para 9.1 delete first two sentences and in the third sentence replace “these areas” with “Guildford Urban area, Ash and Tongham Urban Areas and identified settlements”. In the next line, in brackets add “traffic management” before “public transport”.</p> <p>Retain first sentence of para 9.3. and delete rest of paragraph.</p> <p>Para 9.4 add “infrastructure”. In the second sentence replace “allocated and windfall” with “all”; replace “requirement” with “planned”; after “settlements” add “and neighbourhoods” Add a new sentence at the end of the paragraph, as follows “However, there would be a presumption against compulsory purchase of owner occupied property”.</p> <p>Para 9.5 Delete this paragraph as unnecessary.</p> <p>List of settlements: Amend introductory wording to read “The settlement areas of Guildford Borough are”. In the next two lines delete the words in brackets.</p>
	(a.)	Drivers Jonas on behalf of CEMEX	<ul style="list-style-type: none"> • CEMEX supports the general principles of proposed Policy CP1 'Location of Growth'. In particular, CEMEX supports the allocation of Send and Send Marsh as village settlements in the Settlement Hierarchy set out in Page 19 of the Core Strategy Further Options Paper. • However, CEMEX urges the Council to consider removing selected areas of land from the Green Belt where they would act as natural extensions to existing settlements. Development in these areas would distribute growth evenly across Guildford, allowing the wider borough to feel the benefits of growth. This will enhance village’s sustainability by distributing growth in a way that assists people to live near their work and benefit from key services, minimise environmental impact and, where possible, encourage environmental benefits.
	(a.)	East Guildford Residents Association	<p>Infrastructure and sustainability is frequently mentioned in the Consultation. It is vital that Infrastructure is in place or firmly committed when significant development is contemplated. Some examples of helpful comments in the consultation are:</p> <ul style="list-style-type: none"> • Para 9 – also mentions that development should properly consider infrastructure. • Para 9.5 (page 31) mentions in the summary of previous consultations ‘the option to refuse developments that deliberately fall below thresholds for infrastructure, received overriding support.’ Clearly, this point must always be borne in mind.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	English Heritage	Proposes two key strategic development sites – the town centre and at Slyfield. The extent to which the former can meet the development needs of the Borough, while meeting strategic objective EPE2, remains to be seen and needs to be informed by character appraisal and a sufficiently robust monitoring of change. The draft South East Plan states that the sustainable management of the historic environment through the planning system and other plans and strategies should be based upon an understanding of its significance and vulnerability to change, particularly given the pace and scale of change anticipated. We note the intention to prepare a later LDD, the Guildford Town Centre Area Action Plan. It is desirable for the Core Strategy to provide the overarching policy ‘peg’ on the historic environment from which more detailed policies may follow, having regard to local characteristics and to provide local development plan guidance in advance of adoption of the AAP, should that not be available when considering development proposals.
	(a.)	Environment Agency	Welcome the separation and hierarchy of settlements proposed for the allocation of new development.
	(a.)	Guildford Business Forum	<p>Broadly support this policy, which aims to ensure that development is well located in relation to non-car modes of travel, and that growth up to 2026 can be met.</p> <p>The policy states that development will be directed primarily to Guildford town centre and the other existing urban areas, with the emphasis on maximising the use of previously developed land. This approach might well be sufficient in the short term, and is an important element of sustainable development, but that to really tackle the need for affordable housing in the Borough and the regional requirements of the South East Plan, new allocations on greenfield sites are likely to be required.</p> <p>A five year supply of housing land is essential and must be monitored carefully through the AMR and SHLAA. Support a review of local green belt boundaries to meet housing needs in sustainable locations if during the plan period the five year housing land supply cannot be demonstrated in urban areas and village settlements alone.</p> <p>A comprehensive review of green belt boundaries around Guildford would be an important step to ensure that the town's ability to fulfil its role as a regional hub is fully realised.</p> <p>The south western part of Guildford contains a significant cluster of uses and facilities such as the University, the Surrey Research Park, the Royal Surrey County Hospital, a major hotel, a superstore, and residential areas that together form a centre in their own right.</p> <p>Therefore an opportunity exists to create a sustainable urban extension to the south west of the town. Such an extension could be well related to this existing centre that is already extremely well connected to the town centre by good public transport provision. However road improvements would be required.</p>
	(a.)	Guildford Cathedral	The dean and chapter support this policy and the sequential approach to development that it promotes.
	(a.)	Guildford Environmental Forum	<p>If building is allowed in the Green Belt, it should be an exemplar of high environmental standards. It should for example be a requirement that such buildings include biodiverse green roofs, in this context to enhance the wildlife value of the sites and to reduce the landscape impact of the buildings. (Green roofs also have benefits for sustainable resource management.) Hedgerows and water courses along with any other features that provide wildlife corridors within the areas should also be retained permanently.”</p> <p>We feel that the Core Strategy should include provision for making more stringent demands for sustainability when development takes place on land released from the Green Belt.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Society	<p>Object to term regional hub. The SE Plan proposes that Guildford as a whole should be a regional hub and recognises that hubs will vary. To apply the term to the Urban Area specifically changes the implications of the concept very significantly. It appears to suggest that established residential areas with special character should become a focus for major intensification across a range of uses in a way that was not envisaged in the SE Plan. Different parts of the borough have different contributions to make and to suggest the town centre and urban area should be treated similarly could lead to many inappropriate proposals.</p> <p>Object to the term “all available” at the end of the first paragraph. Under the definition of previously developed land, this would mean every garden needs to be redeveloped before greenfield land is considered. We do not oppose a presumption in favour of wise use of previously developed land but ask for far more careful wording that will avoid “cramming” on such land and ensure redevelopment is sensitive to the character, qualities and capacity of sites judged on a case by case basis. This would be consistent with EPE2.</p> <p>Paragraph 9.1 This paragraph does not accurately reflect MSG2.</p> <p>Commitment to need to protect established character, including residential character is welcome. This should be reflected in the policy itself.</p> <p>Development at Slyfield would perhaps be better characterised as an extension of existing development and remediation of land that has been in waste use. Insert “partially” before previously developed land. Clear reference should be made to the need to remediate the polluted land, protect water sources from contamination, overcome the very serious traffic congestion problems in the vicinity, re-establish a functional flood plain, enhance wildlife habitat and achieve a sensitive landscape impact from this very visible site. Will the closed landfill, with all its leachate problems, be relocated? Are nearby water sources still contaminated? How will access be achieved given constraints such as the flood plain, congestion on the Woking Road and the inadequacy of A3 junctions (as recognised by the Highways Agency)? Will natural flood plain levels be restored at this significant, artificially raised spur in the Wey floodplain? Restricting the flood plain here could increase flood risk in neighbouring areas. A significant part of the site is in the flood plain, notwithstanding the fact surface heights are deceptive due to the “made ground”. The sequential test in PPS25 should apply.</p> <p>Please add qualification about respecting and enhancing character of environment and delivering sustainable development to the settlement hierarchy.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Highways Agency	<p>Supportive of the intention to primarily locate development within Guildford town centre and urban area followed in sequence by the less urban areas. Support the use of the sequential test for the development of new land and prefers that development is located in urban areas where there is existing infrastructure available for sustainable transport modes. Typically would be very concerned about large scale out of town development as this would tend not to align with sustainable development principles, particularly in transport terms.</p> <p>Support the aim to ensure that development is sustainable in transport terms.</p> <p>Detailed comments in relation to development at Slyfield will be made in reviewing the transport assessment work that is undertaken. However, until evidence is produced to the contrary the HA remains concerned over the potential impact of this development on the A3.</p> <p>Would expect that there has been some assessment work undertaken of the impact of any potential green belt development should it be deemed necessary in exceptional circumstances. The HA recognises that new transport hubs can be developed over time that would facilitate the use of non car modes and provide opportunities to reduce the need to travel as well as the length of journeys. This process is likely to require substantial investment.</p> <p>Agree that the phasing of development will be vital and is supportive of the early provision of guidance to developers, ideally at the pre application stage to allow the required infrastructure to be installed within an appropriate timeframe. Emphasis should also be based on the controlled release of development such that an imbalance does not occur during the progression of the development, either at an individual site level or at more strategic level with adjacent complementary developments.</p>
	(a.)	Member of the public	<p>Guildford is a regional transport hub, but should not be put forward for further development as a regional centre due to topographical difficulties. Hub and centre are not quite the same thing, but the text here and in the SE Plan are confused. Crewe is a famous railway hub, but nothing of a regional centre.</p>
	(a.)	Member of the public	<p>Agree that the Greenbelt should be protected until all other means of housing have been exhausted. Rather than the South East the government should encourage more development in areas where the housing stock and land is more readily available by creating jobs in those areas. The developers are leading government, when it should be the reverse. Should land be taken in the greenbelt, local government must insist that it is not just the creation of soulless estates with houses so close that there is no breathing space. Rather there should be development about which the borough can be proud.</p> <p>It is not necessary to build 5/6 bedroom houses, but a good mixture that enhances the borough. Surely, local government should employ architects that set down the parameters for such a area, and subdivide these for different developers to do that which they do well. If you take the Weylea and Merrow estates, these have several hundred houses each, dull uniformity with no soul. From an architectural point of view, they are ugly to an extreme.</p>
	(a.)	Member of the public	<p>Agree with the approach</p>
	(a.)	Ockham Parish Council	<p>Support the policy, subject to clarification of what exactly is meant by "previously developed land" otherwise land that had houses on it over 100 years ago and has since been agricultural land within the Green Belt might be previously developed land. If there is a definition in statute or government guidance reference to it should be included.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	<p>Policy states that development will be directed primarily to Guildford Town Centre and Guildford Urban Area. Objected to with changes</p> <p>Policy also states that development should seek to make use of all available previously developed land. The approach is supported to some extent with some changes. The identification of Guildford Town Centre and the Slyfield Regeneration Area as key strategic development sites to create vibrant communities. The approach is supported in principle, however these locations in isolation will be insufficient. Changes needed. Lastly the policy seeks to protect the Green Belt from inappropriate development unless very special circumstances apply. The policy should state that as part of a Green Belt review for the Borough the opportunity will be taken to identify land to the south of Guildford town as a sustainable urban extension. Changes required.</p> <p>Changes suggested to Paragraph 9.1, 9.3 and 9.4 of the Core strategy</p> <p>The scale of housing need identified within the SHMA indicates that such a long-term strategic decision such as a Green Belt review should be undertaken now. On page 32, reference is made to policy changes since the Preferred Options Consultation, specifically to Planning Policy Statement 3 (PPS3), November 2006. (PPS3 referenced in detail)</p> <p>Limited reference is made to the SHMA within the Core Strategy. It is apparent from the SHMA that the housing requirement will not be achieved.</p>
	(a.)	RSPB	<p>Concern that new development identified in the Core Strategy could, alone or in combination with other plans, lead to an adverse effect to the ecological integrity of the TBH SPA, and Thursley, Ash, Pirbright and Chobham SAC sites. The impact from recreational disturbance on these designated sites is of particular concern to us, in addition to the effects of other urban pressures such as pollution or fire. The locations identified in the Core strategy, which are of most concern to us, are the Slyfield Industrial Estate redevelopment and further development in Ash and Tongham, as both these areas are within 2km of the TBH SPA. We are glad to see that the Council has adopted a precautionary approach and assumed that harm will occur to the internationally designated sites from development, until it is demonstrated otherwise. This will mean that under the requirements of the Habitats Regulations an appropriate assessment will have to be undertaken to determine that there will be no adverse effect to the internationally designated sites from the proposed development in the Core Strategy, alone or in combination with other plans.</p>
	(a.)	SEEDA	<p>Support this option which recognises the role of the Guildford urban area as a regional hub, where development will be directed to previously developed land in the first instance. This supports SEEDA's overarching vision to make the south east a world class region achieving sustainable prosperity by 2016. We would wish to ensure that the (as yet unpublished) ELR demonstrates that sufficient employment land is retained to support the economic growth of Guildford, in advance of it being released for other uses.</p>
	(a.)	Shalford Parish Council	<p>Commitment to protection of Green Belt land, and emphasis on importance of making full use of all available previously developed land</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Shere Parish Council	<p>CP1 and CP2 blur different issues. These issues are the construction of locally needed affordable housing within or close to village settlement areas, the reliance on village settlement areas to make “important” contributions to meeting the regional housing targets, and the possible release of Green Belt land in the future if there are insufficient planning permissions granted on non-Green Belt land. Our fear is that the current combination of policies could be represented in the future as enabling development for market housing (or even non local needs affordable housing) in rural areas outside of the settlement areas.</p> <p>We are concerned that the sentence “The surrounding rural areas will be supported and enhanced through appropriate limited development” could be seen as supporting development in the Green Belt in spite of the last sentence of this policy. Clearly there needs to be definition of “appropriate”, as it could be argued that any development that has been allowed is therefore “appropriate”. We disagree with this policy if it is intended to shift towards allowing more development in rural areas including the Green Belt. This would undermine the Green Belt in principle.</p> <p>This appears to be a wider threat than that of allowing limited development in the Green Belt adjoining Guildford that has been proposed as a possibility by the government, and which would be triggered by a failure in housing supply. We are concerned about the way in which the attempt has been made to create a sequential settlement hierarchy. The sequential test is meaningless in a system that responds to many and diverse applications, How would the assessment of applications work sequentially?</p> <p>It would only make sense if one were to say that there would be no development in village settlement areas unless there were no land available in urban areas. We are sure that this is not the intention, so the policy needs clarification. The settlement areas of Peaslake and Holmbury St. Mary, are the only ones in the borough that are outside the London Fringe, and thus in the “residual area” so this is an issue of concern to us.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Solum Regeneration Partnership	<p>Support the principle of focussing development in the Borough at Guildford Town Centre and that development should make full use of available previously developed land. Support Guildford's approach in being pro-active to redevelopment opportunities and the creation of a Town Centre Area Action Plan.</p> <p>However, object that strategic development sites in the town centre are not identified. PPS12 encourages strategic allocations to be made in the Core Strategy. Whilst the Friary Centre and North Street are referred to there is no mention of other strategic development sites such as land adjacent to the railway station, Civic Hall and Bedford Road.</p> <p>Agree that mixed use developments are proposed in the town centre. However, there should be a policy for each key site. There is not enough reference to the benefits of land at Guildford station throughout the Core Strategy. Guildford is a major station serving London and the South East of England and is of considerable importance to employers, commuters and visitors, there is untapped potential for retail and commercial uses. Furthermore, there is sufficient land available for a food store to serve commuters and residents. Budget hotels could also be located adjacent to the station which would help to enhance Guildford as a tourist destination that is accessible by public transport.</p> <p>The redevelopment of land at Guildford station would have far reaching consequences for the town centre, the Borough and on a strategic scale given the importance of Guildford Station on the rail network. The Council should therefore embrace this important town centre gateway site and should include it as a strategic allocation in the Core Strategy.</p> <p>We therefore recommend there is a policy for the redevelopment of land at Guildford station for mixed uses to include: Retail (all types), leisure, hotels, restaurants, residential, commercial, transport use and parking for station</p>
	(a.)	Surrey County Council	<p>Support the primary approach of directing development to Guildford Town Centre and the urban areas of Ash and Tongham, followed by identified settlement in the rural areas (as listed sequentially). Support the approach to appropriate limited development within rural areas to support and enhance the locality. Support the protection of the Green Belt from inappropriate development.</p> <p>Support the Slyfield area as an area which would be suitable for sustainable development, provided educational infrastructure to mitigate the effects of children and young people yielded from new developments is provided.</p> <p>Support the protection of a waste management facility for the Slyfield area.</p> <p>There is pressure on educational infrastructure in the proposed Guildford Town Centre area. Without support for increasing educational infrastructure in the Town Centre area to mitigate the effects of children and young people yielded from new developments, we would not consider it less suitable for sustainable development.</p> <p>In our view, the provision of educational infrastructure to meet the needs of local children and young people in the community may be an example of the very special circumstances for development within the Green Belt.</p> <p>Heritage Issues Add a sentence to make specific reference to Conservation Areas, Areas of High Archaeological Potential (AHAP's), Areas of Special Historic Landscape Value (ASHLV's), Scheduled Monuments (SAM's) and Listed Buildings.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Taylor Wimpey	Support the general thrust of this policy which directs growth primarily to Guildford and Tongham. Should brownfield housing sites fail to come forward at the rates predicted by the Council, sustainable greenfield sites on the edge of these urban areas should be the first areas of search for any new releases. Our company controls land near Guildford and Tongham, which are well placed to meet any identified need. Support the settlement hierarchy which identifies the regional hub of Guildford and the Tongham and Ash urban areas as the key settlements in the borough.
	(a.)	Terence O'Rourke	It will be necessary to develop land beyond the urban areas in order to meet development requirements. Guildford Borough Council has therefore commissioned a Countryside and Green Belt release study. Maximum use should be made of land at sustainable locations not affected by a Green Belt designation, as required by national policy. The South Eastern area of Ash contains the only sizable area of land within the Guildford Borough Boundary that is not designated as Green Belt. Development in this area represents a sustainable and unique opportunity to allocate housing, however this opportunity is not recognised in Guildford's Core Strategy document. (a)– No (c)- No (d) - Yes Should state "The Countryside Beyond the Green Belt is a preferable location to receive future growth, subject to development not demonstrably harming the physical and visual separation of settlements, either within or adjoining the borough."
	(a.)	Thames Water	We are working in partnership with Guildford Borough and Surrey County Council to transform the Slyfield Regeneration Area and therefore wholly support the identification of the site as a Key Strategic Development Site. A number of water and sewage treatment works in the Guildford Borough are located in the Green Belt, such as Shalford Water Treatment Works and the Sewage Treatment Works (STW) at Hockford, Wisely, Ripley and Unstead. A key sustainability objective for the new Local Development Framework will be for new development to be co-ordinated with the infrastructure it demands. It will be inevitable that some of this new water/sewerage infrastructure will need to be located in the Green Belt where the existing facilities exist and it is considered essential that this is recognised in the Core Strategy and a policy drafted which allows essential utilities development in the Green Belt.
	(a.)	The Clandon Society	Agree that previously development land must be used before Green Belt, green field, commons or allotments. We also feel that there should be no need to use Green Belt land as there is sufficient available elsewhere.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	University of Surrey	<p>Broadly support this policy, which aims to ensure that development is well located in relation to non-car modes of travel, and that growth up to 2026 can be met.</p> <p>Development will be directed primarily to Guildford town centre and the other existing urban areas, with the emphasis on maximising the use of previously developed land. This might well be sufficient in the short term, and is an important element of sustainable development, but to really tackle the need for affordable housing in the Borough and the regional requirements of the South East Plan, new allocations on greenfield sites are likely to be required.</p> <p>Maintaining a five year supply of housing land is essential and must be monitored carefully through the AMR and SHLAA. Support a review of local green belt boundaries to meet housing needs in sustainable locations if during the plan period the five year housing land supply cannot be demonstrated in urban areas and village settlements alone. A comprehensive review of green belt boundaries around Guildford would be an important step to ensure that the town's ability to fulfil its role as a regional hub is fully realised.</p> <p>The University itself is a significant element in the regional economy, and is an engine for growth. It has seen student numbers increase and expects these to increase further in line with its strategic plan and vision for future growth. It has planning permission for its master plan for its Manor Park campus, the first phases of which are now in place, and that will see the construction of significant new academic floorspace and student residences over the next 10 – 15 years. Its growth has seen and will continue to see considerable improvements in public transport in the south west of Guildford, linking the campus and surrounding area to the town centre and railway station.</p> <p>Indeed this south western part of Guildford contains a significant cluster of uses and facilities such as the University, the Surrey Research Park, the Royal Surrey County Hospital, a major hotel, a superstore, and residential areas that together form a centre in their own right.</p> <p>The University therefore considers that an opportunity exists to create a sustainable urban extension to the south west of the town, on land adjacent to Manor Park, the Surrey Research Park, and this south western centre as a whole. Such an extension will be well related to this existing centre that is already extremely well connected to the town centre by good public transport provision.</p> <p>The land immediately adjacent to Manor Park and the Surrey Research Park is owned by the University of Surrey and is known as Blackwell Farm. The University has prepared a preliminary framework plan for the site that shows two options for how it might be brought forward. This document is enclosed in support of these comments. The University would be happy to discuss these options, and appropriate variations of them, further with the Council.</p>
	(a.)	Westborough, Broadacres & District Residents Association	<p>Support previously developed land be used prior to considering developing greenfield or undeveloped land such as commons and Allotment Sites.</p>
	(a.)	Wilmslow owners of the Friary shopping centre	<p>Generally support - requires development to be directed primarily to Guildford Town Centre and Guildford Urban Area. However, it is not considered sufficient to identify the town centre in its entirety as a key strategic development site. The town centre in itself is not a single development site and much of it is constrained by the town's historic assets. Potential development sites close to the town centre may also fall outside current or future definitions of the town's primary or secondary shopping frontage and, in our opinion, such a designation has little meaning and does not provide a sound basis for prioritising emerging development in the town consistent with its status as a major centre for change.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Woolf Bond Planning on behalf Martin Grant Homes Ltd	Support the strategic objectives attached to Policy CP1. In particular, development should be directed to the most sustainable locations in the Borough and that growth should be primarily contained within existing well-served urban areas through strategic development sites. The LDF Core Strategy should promote strategic growth at Guildford as the principal strategic location in this part of Surrey. Guildford urban area identified as a 'regional hub'. It is identified as the principal urban area in the Borough with the majority share of housing, employment, retail and infrastructure provision. Supports a strategy that underpins and provides for a material amount of housing and related growth at Guildford during the plan period to 2026 and beyond. It is considered that wholly avoiding the development of greenfield sites and release of Green Belt land may not be possible or indeed desirable in planning for the housing requirements allocated to the Borough in the emerging South East Plan. Policy should be amended to allow flexibility in meeting regional housing requirements and should include reference to the need to plan for greenfield housing allocations, to include the release of Green Belt land as necessary, in meeting the emerging South East Plan housing requirement to 2026.
	(b.)	Barton Willmore	Sets out a 'sequential' settlement hierarchy for development to be directed. The sequential approach to development had its place in PPG3, now superseded by PPS3 where the 'sequential approach' is not continued. PPS3 seeks 'suitable locations' for housing development to be identified which support its objective of creating mixed and balanced communities. Reference to 'sequential' should be removed.
	(b.)	Carter Planning Limited	Yes. Policy does not adequately address the need for housing development in the Borough which will require greenfield land
	(b.)	Crownhall Estates	Greater weight should be applied to a selective approach of greenfield land on the edge of settlements; people want to live in houses in a pleasant environment; too much emphasis is placed upon flatted development which is not a successful social and economic model.
	(b.)	Member of the public	Compulsory purchase powers should only be used as a last resort for important projects, whose importance outweighs the considerable disadvantages to those whose properties are compulsory acquired. Councils have considerable compulsory purchase powers, and it perhaps needs to be added to the Core Strategy, that they should be used extremely rarely and with great sensitivity. Compulsory purchase powers should not put at risk Victorian buildings and houses of character which add to the distinctiveness of the town centre and immediate area and a safeguard should be written into the Core Strategy.
	(b.)	Tribal MJP	This policy lacks flexibility in terms of development sites that do not fall within the guildford town centre, the guildford urban area or a previously identified village settlements. Development should also be considered within suitable areas that do not fall with these designated locations. Such sites within the green belt, particularly where land is surplus to existing requirements and may be an asset in terms of future investment.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(c.)	Barton Willmore	<p>PPS7 provides national policy regarding the location of new development at towns and villages. It states that away from larger urban areas the focus for most new housing (and other forms of development) should be at rural service centres which are served by public transport and opportunities for walking and cycling. Such centres should be identified as the preferred location for development.</p> <p>The proposed settlement hierarchy outlined overlooks the fact that other centres besides Guildford and Ash/Tongham, which are within the third tier, vary considerably in size and their comparative sustainability. In particular, East Horsley is the most sustainable settlement in the London Fringe part of the Borough after Guildford. East Horsley has the largest population of the settlements in the third tier of the hierarchy. East Horsley benefits from a Rail Station good local bus services; and a District Centre offering a range of services and facilities. The settlement is located within a short travel distance of all 3 Regional Hubs within the London Fringe Sub-region, all of which can be reached via public transport. Furthermore, East Horsley has good road links to surrounding centres and to the M25.</p> <p>The Core Strategy should therefore distinguish between the 'higher order' nature of East Horsley, in terms of its sustainability, from other smaller settlements identified within the third tier of the hierarchy. This would assist in providing greater clarity regarding the distribution of housing development in the Borough.</p>
	(c.)	Barton Willmore	<p>PPS3 requires policies and strategies to ensure a flexible, responsive supply of land. Inclusion of 'Countryside Beyond the Green Belt' on a location for growth is considered to assist in the delivery of a flexible approach in the event the Council is unable to identify a five year supply of land. On the basis of additional collection of background evidence, if the Council agrees that 'Countryside Beyond the Green Belt' could accommodate growth, it should be referred to.</p>
	(c.)	Barton Willmore	<p>Whilst PPS3 encourages the development of previously developed land as a priority, it does not preclude the development of greenfield land before all brownfield land has been developed. PPS3 expresses a preference that housing is developed in 'suitable locations', those which offer a range of community facilities and with good access to jobs, key services and infrastructure.</p> <p>The approach does not accord with PPS3 and should be re-worded.</p>
	(c.)	Carter Planning Limited	<p>The policy fails adequately to provide for future housing land</p>
	(c.)	Guildford Society	<p>Policies to be replaced by the Core Strategy</p> <p>The table on pages 121 and 122 of the Consultation states which Local Plan policies it is intended to replace with Core Strategy core policies.</p> <p>G12: Location of Development, in terms of accessibility to public transport. Replaced by CP1 Location of Growth, which is based on a sequential approach to locations (Guildford Town Centre etc). These two approaches are not identical and CP1 is more holistic. However CP1 makes no mention of infrastructure, for instance the new infrastructure requirements of development at Slyfield. We recommend that CP1 should explicitly state that it is conditional on the infrastructure requirements of CP5 being met.</p>
	(c.)	King Sturge LLP	<p>Agree that Guildford Town Centre is the most suitable location for redevelopment to provide mixed uses, and this policy recognises the draft South East Plan's identification as a "Centre for Significant Change".</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(c.)	Terence O'Rourke	<p>Support para 9.3. This reflects the requirements of PPS3. d) - Yes</p> <p>Add to the first paragraph of policy: "If at any year during the Core Strategy Plan Period (2006-2026) a deliverable supply of housing land within the urban areas and village settlements cannot be demonstrated for the following five years, Countryside beyond the Green Belt, and/or Green Belt release would need to be considered".</p>
	(c.)	Vail Williams	<p>The location of existing developments is an important factor in and around Guildford. The Royal Surrey County Hospital is a vital community facility located within close proximity to a cluster of important major facilities. The Royal Surrey County Hospital will require ongoing capital expenditure during the Core Strategy period and beyond. Promote a Local Development Order (LDO) covering the existing land operated by the Royal Surrey County Hospital. The proposed LDO should extend permitted development rights, reduce the ongoing workload of the Council (in considering minor planning applications) and enable specific agreement on development areas. PPS12 offers guidance on the preparation of an LDO and we advocate that a separate Development Plan Document should be prepared. The Trust wish to discuss this further with the Council and recommend reference is made to this suggested approach in this policy.</p>
	(c.)	Woolf Bond Planning on behalf Martin Grant Homes Ltd	<ul style="list-style-type: none"> • Planning Policy Background info. Respondent quotes PPS3 paragraph 10, Paragraph 37 and paragraph 38. • Need to identify a need to recognise the principle of a Green Belt amendment at the Local level. • The case for a Green Belt release at Guildford is even more compelling given the strategic role of the town both in terms of its County status and its role in the wider London Fringe sub-region as identified in the emerging SE Plan. • Respondent quotes Structure Plan Review, Surrey County Council published Technical Paper No.5 entitled "The Green Belt in Surrey" paragraph 5.2 conclusion. We support the conclusions of the Technical Report and suggest that the findings set out in the same are even more relevant given the likely need to accommodate an increased scale of housing growth in the period to 2026. • SCC published Technical Paper 2: Evaluation of locations as new communities. Guildford, Redhill and Woking emerged as the most suitable locations to accommodate an urban extension(s). • Respondent quotes the emerging SE plan and in particular all mentions of any green belt release to the north east of Guildford. • Respondent quotes now superseded surrey structure plan and quotes sections which relate to green belt release around Guildford and developments to the town. • Respondent provides information about the site which they are representing, Gosden Hill farm in NE Guildford. • Respondent lists types of transport that could be utilised if any development were to occur, these include a new railway station and park and ride facility. • Respondent provides information relating to a mixed use development on the site including, housing, schools and employment. • Respondent provides summary of the benefits of developing their clients land would have on Guildford.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Barton Willmore	<p>Refers to the settlement hierarchy and identifies that development will be directed primarily to Guildford Town Centre and Guildford Urban Area, to Ash and Tongham urban area, followed by the identified village settlements. This approach to the spatial vision is supported. However it should go further to clarify the role of 'Countryside Beyond the Green Belt' in the spatial vision.</p> <p>A role for the designation 'Countryside Beyond the Green Belt' identified on the key diagram is not defined in the Policy or identified settlement hierarchy. It is recognised that the background evidence in preparation i.e. the Green Belt and Countryside Study and SHLAA, will provide the evidence base necessary to clarify this but this just serves to reinforce the 'cart before the horse' with respect to gaps in the evidence base.</p> <p>Urban growth at Ash and Tongham is identified as a sustainable option in accordance with the key themes and strategic objectives of the Core Strategy. 'Countryside Beyond the Green Belt' at Ash and Tongham will need to be considered should the SHLAA not be able to demonstrate a deliverable supply of housing land within the urban areas and village settlements. This preference should be expressed and included in the re-wording of the Policy.</p> <p>'Countryside Beyond the Green Belt' is not defined within the Core Strategy Glossary. A definition should be included.</p>
	(d.)	Barton Willmore	<p>Whilst still at draft stage, is considered 'unsound' because</p> <p>At present the Core Strategy does not meet the requirements of PPS3 or PPS12.</p> <p>PPS3 requires Local Planning Authorities to set out policies and strategies in its Core Strategy to enable the continuous delivery of housing provision for at least 15 years from the date of the adoption. The 15 year time horizon is supported by PPS12 as well as the requirement for the Core Strategy to give a clear steer on locations for development. The Core Strategy in its current form does not accord with this requirement.</p> <p>The relatively early preparation stage of the Core Strategy is acknowledged, however key background evidence required to underpin the Core Strategy and locations for development is missing. The next stage, the Submission Core Strategy Regulation 27 consultation, is timetabled in September 2009. This next consultation document will be informed by the key background evidence currently under preparation including the Strategic Housing Land Availability Assessment (SHLAA) and the Countryside and Green Belt Review. This next consultation stage of the Core Strategy will therefore be in a position to conform to the requirements of PPS3 and PPS12. The role of 'Countryside Beyond the Green Belt' in assisting with meeting the Borough's housing requirement is not clarified in the current consultation document.</p>
	(d.)	Carter Planning Limited	Does not deal adequately with the quantum or location of housing needed arising from the South East Plan
	(d.)	Drivers Jonas on behalf of CEMEX	<ul style="list-style-type: none"> • Respondent states they will access the CS based on the 'tests' set out in PPS12. • Respondent describes the site for which they are representing on behalf of CEMEX, Papercourt in Send.
	(d.)	East Horsley Parish Council	Consider that growth should be concentrated in urban areas, any growth in village areas should be strictly controlled to preserve both local atmosphere and characteristics, and only be permitted if local infrastructure (eg schools) can accommodate it.
	(d.)	Effingham Parish Council	Support. The Policy should state the need to consult parish councils about any special circumstances which may apply in the Green Belt.
	(d.)	Member of the public	More stringent demands for sustainability when development takes place on land released from the Green Belt should be included.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	SEERA	<p>We note that evidence base studies for a range of uses, including your SHLAA and a Green Belt and Countryside Study, have not yet been completed. However, once this information is available, it is important that the Core Strategy should set out the quantum of development that is expected in broad terms for the various uses and its distribution in the borough over the plan period and how this will be delivered. The policy should also set out appropriate parameters for levels of development in Guildford Town Centre to guide the Area Action Plan and for the strategic site at Slyfield to guide the masterplan.</p> <p>The section does not fully reflect the South East Plan, which sets out a requirement for a selective review of the Green Belt boundary in the Metropolitan Green Belt to the north east of Guildford, although we accept that selective reviews of Green Belt boundaries to provide for urban extensions need only be undertaken where it is not possible to meet housing needs mainly within urban areas. As it is not proposed that the Core Strategy should replace Policy RE1 (Extent of the Green Belt) of the 2003 Local Plan, it is important that the borough council is able to demonstrate through its evidence base at submission stage that the current proposed strategy of not amending the Green Belt boundary is the most appropriate one. We note that the table at the end of the section suggests that wholly avoiding Green Belt release may not be possible. If this proves to be the case, the exceptional circumstances and mechanisms for Green Belt release should be set out in policy.</p>
	(d.)	Smiths Gore	<p>Consider that the current framing of the policy is over-reliant on urban intensification and windfall sites on previously developed land. As such, the policy is not considered to be consistent with national policy set out in PPS1 and PPS3 which requires Local Authorities to take a more proactive stance to the allocation of development sites.</p> <p>Additionally, whilst the objective of supporting and enhancing the rural area through appropriate development is supported, neither the policy or supporting text make any mention of how such development will be delivered, given the scarcity of previously developed land in rural areas and the presence of the Metropolitan Green Belt.</p> <p>The Policy should be re-worded to contain an explicit commitment to green-belt reviews to permit the expansion of rural communities where this would help meet identified policy objectives.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Terence O'Rourke on behalf of Wharf Land Investments (Jersey) Ltd.	<ul style="list-style-type: none"> • Policy CP1 states that “Green Belt land will be protected from inappropriate development unless very special circumstances apply”. • Given the tightness of Guildford’s Green Belt boundary there is great uncertainty as to whether sites within the urban areas are capable of satisfying future development requirements. • In order to promote sustainable development and provide sufficient flexibility to support delivery of the Core Strategy’s objectives, the development potential of previously developed sites within the Green Belt needs to be recognised. • Guildford’s Core Strategy and Green Belt and countryside release study should reflect the fact that the Wisley Airfield site, as located on the enclosed map, constitutes a unique opportunity within the Guildford Green Belt, capable of accommodating development pressures whilst preserving the integrity of the Green Belt and wider environmental value. • The respondent suggests that the Wisley Airfield site should be defined as a major developed site. • Respondent lists the purposes of the green belt and how the Wisley airfield site adheres to these. Greenbelt Purpose One - To Check the Unrestricted Sprawl of Large Built up Areas Green Belt Purpose Two - To Safeguard the Surrounding Countryside from Further Encroachment Green Belt Purpose Three - To Prevent Neighbouring Towns from Merging into One Another Green Belt Purpose Four - To Preserve the Special Character Of Historic Towns Green Belt Purpose Five - To Assist In Urban Regeneration • respondent quotes Para 1.6 of PPG2 then states development of the airfield site would not significantly prejudice the use value associated with designating land in the Green Belt principally because site can be developed sensitively, its on previously developed land, can preserve the natural environment, and so the best way to improve the aesthetic value of the previously developed site would be to permit a high quality development. <p>Relevant Core Strategy consultation questions:</p> <p>a) Do you agree with the approach of the policy/section? - No</p> <p>d) Have we missed anything you consider is important? - Yes</p> <ul style="list-style-type: none"> • The development potential of the WA site is recognised through its allocation in the Surrey Waste Plan, which supports development in this location against a wide range of competing sites. • Equipping WA with Major Developed Site Status will help alleviate significant development pressures in the Guildford area, hence help fulfil the objectives of Guildford’s Core Strategy • When considering which other sites should be included in the MDS designations, attention should be paid as to whether redevelopment of such sites offers the opportunity for environmental improvement. This criterion for designation should be brought forward from the existing Guildford Local Plan to the Core Strategy. • Respondent suggested text should be amended in CP1 “Accommodating growth in Guildford may require development in the surrounding Green Belt. Growth may necessitate the provision of new Major Developed Sites within the Green Belt. Locations being considered for designation as a Major Developed Site include Wisley Airfield....” • Conclusion: Policy CP1 should have the following wording inserted: “Accommodating growth in Guildford may require development in the surrounding Green Belt. Growth may necessitate the provision of new Major Developed Sites within the Green Belt. Locations being considered for designation as a Major Developed Site include Wisley Airfield....”

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	The Clandon Society	9.5 The named settlements are different in character from each other. When opening up the settlements for development will the Strategy seek to maintain the core character of each settlement? In addition will there be a hierarchy among the settlements themselves?
	(d.)	Vail Williams	Slyfield regeneration project (SARP) is owned by the council. It seems highly inappropriate for the only specific key strategic growth site identified, to be owned and controlled by the council by which GBC are seemingly discounting the many other sites put forward which no doubt are comparable. We note that the councils ability to bring their own sites forward is open to question particularly given the council owned sites identified in the local plan for the past 20 years have consistently failed to be delivered. The second issue here is that the SARP land is identified as a key strategic devt site without any recognition of the myriad of issues with deliverability that currently exist. We query in particular why no information has been put forward or supporting policy drafted in relation to the highway improvements required to make the site accessible. In the event this cannot be resolved in the short or even medium term, the councils slyfield land may be undevelopable and alternative locations for development allocations must be made.
	(d.)	Vail Williams	The text allows for Green Belt release to meet an identified need for housing which cannot be met on Brownfield land. We consider this same approach should be replicated for employment land in the Borough therefore paragraph 9.3 should be amended to reference the ELR also.
	(d.)	Vail Williams	The SHLAA and ELR are key documents which must be completed before this policy is finalised to ensure that the correct approach is taken for the location of the proposed growth identified.
	(d.)	Woodland Trust	Give ancient woodland explicit and absolute protection like the specific protection given to 'green belt land'. A statement saying that it 'will be protected from development'. This would be in line with Government policy as stated in Planning Policy Statement 9 on Biodiversity and Geological Conservation The high environmental capital and irreplaceable nature of ancient woodlands and veteran trees should be recognised within planning guidance and development strategies by a presumption against their removal or damage.
	(e.)	Barton Willmore	Add: 'In the event that a deliverable supply of housing land in these areas cannot be demonstrated for the following five years, Countryside Beyond the Green Belt will be considered in accordance with the identified settlement hierarchy.' Amend to: 'Development of previously developed land will be prioritised. Green Belt land will be protected from inappropriate development unless very special circumstances apply.'
	(e.)	Barton Willmore	Add 'Countryside Beyond the Green Belt at Ash and Tongham' to the end of the settlement hierarchy.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Boyer Planning on behalf of the Diocese of Arundel & Brighton	<p>Support the thrust of this policy however, the sequential approach included in the final sentence of the first paragraph is inappropriate. National policy requires Local Authorities to adopt an options-based approach and whilst the Government's priority remains the use of previously-developed land, proper consideration must be given to suitable greenfield opportunities in the context of the overall strategy. Accordingly the policy should recognize the role of both previously-developed and greenfield land when defining settlement boundaries and allocating development sites in the subsequent Site Allocations DPD.</p> <p>The reference to Green Belt land in the final paragraph of the policy is inadequate as it is expressed in the context only of development control and not Green Belt boundary definition, the relevant aspect for this policy. The South East Plan provides scope for a review of Green Belt boundaries to 2031 and, as a Green Belt authority, the Borough Council has a duty to ensure that the Green Belt and settlement boundaries are drawn so as to accommodate likely development requirements to 2031. Suggests that this sentence is replaced.</p>
	(e.)	Burpham Community Association.	<p>There are already large flooding problems at the Wey river (Burpham Farm) and developing more houses on the land will only add to the flooding problems. The statement - "Green Belt land will be protected from inappropriate development unless....." opens the door to enable development on the green belt and should be removed.</p>
	(e.)	Carter Planning Limited	<p>Policy needs to deal with where and how much greenfield land will be required.</p>
	(e.)	Holy Trinity Amenity Group	<p>This is not clear, particularly the jargon "sequential settlement hierarchy". The immediate interpretation is that Guildford Urban Area is filled up first, then the other areas in sequence, which cannot be correct. This policy should be defined as "Location of Housing Growth" and we consider that both of the two designated urban areas should be subject to expansion to a same percentage target, with the designated rural settlements set a somewhat lower percentage increase. We ask that this be reworded.</p> <p>The associated government objective that urban intensification should enhance and not degrade the quality of an area needs to be stated.</p> <p>The SE Plan is only a draft, and as a result of the changing conditions might be radically revised. This should be recognised in this section with a commitment to revise the Strategy immediately any changes are made to the SE Plan.</p>
	(e.)	John Moore Trust	<p>The settlement hierarchy for Guildford Borough should include as the last entry; Countryside Beyond the Green Belt at Ash and Tongham</p>
	(e.)	Member of the public	<p>"The surrounding rural areas will be supported and enhanced through appropriate limited development" does not give the protection needed to the countryside. It reads as supporting development in the countryside, rather than giving protection to the countryside. It is not clear how development would be limited or deemed appropriate.</p> <p>It is not clear how inappropriate development and special circumstances would be defined. Green Belt policies, which were created to prevent development in the Green Belt should apply and be stated in this Policy section.</p>
	(e.)	Member of the public	<p>A problem with the South East Plan is that it nominates both Woking and Guildford as regional hubs. They are too close together for this purpose. The two towns could end up in unnecessary competition with each other and lead to unneeded development.</p> <p>The named settlements in the hierarchy are different in character from each other, with some being almost entirely residential, others with a retail or modest business element. Seek to maintain the core character of each settlement. Will there be a hierarchy among the settlements themselves?</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Vail Williams	The policy is not flexible enough to allow for other more suitable sites to come forward to meet the boroughs strategic objectives with the preference being for the councils own sites to come forward first. We suggest the wording is amended to: "Guildford Town Centre" and land adjacent to the slyfield industrial estate will be key strategic development sites". You note we have deleted "where there is scope for sustainable redevelopment to provide mixed uses and sustain or create vibrant communities". The reason being is that it is a fundamental aim of PPS1 for development to be sustainable and contribute to creating vibrant communities, and therefore it is an unnecessary repetition of accepted government policy. However, if this wording were retained in the policy it has the potential to limit other suitable development land coming forward (for example where only a single use may be appropriate), which I am sure is not the councils intention here.
	(e.)	Wanborough Parish Council	List Parishes not currently given the status of Settlements to establish areas where some developments could take place on a small scale providing a valuable contribution to the targets-and not just affordable housing. The Strategy goes on to virtually rule out such developments making it difficult in the future to consider possibilities rationally.
CP2	(a.)	Barton Willmore	This policy is 'unsound', is not 'effective' in that it does not provide for flexibility in the Core Strategy and it is not 'justified' due to an incomplete evidence base. At present the Core Strategy does not meet the requirements of PPS3 or PPS12. PPS3 requires Local Planning Authorities to set out policies and strategies in its Core Strategy to enable the continuous delivery of housing provision for at least 15 years from the date of the adoption. The 15 year time horizon is supported by PPS12 as well as the requirement for the Core Strategy to give a clear steer on locations for development. The Core Strategy does not meet this requirement. PPS3 requires Core Strategy to accord with housing requirements set out in the South East Plan. The housing requirement is set as a 'minimum' requiring Core Strategies to test over and above the housing requirement set. This should ensure flexibility in the Core Strategy and the ultimate delivery of housing in the long term. In its current form the Core Strategy does not achieve this requirement. The relatively early preparation stage of the Core Strategy is acknowledged, however key background evidence required to underpin the Core Strategy and locations for development is missing. The next consultation document will be informed by the key background evidence currently under preparation including the SHLAA and the Countryside and Green Belt Review and be in a position to meet the requirements of PPS3 and PPS12. The role of 'Countryside Beyond the Green Belt' in assisting with meeting the Borough's housing requirement is not clarified.
	(a.)	Carter Planning Limited	No
	(a.)	CEMEX	Support the reference to the identified village settlements contributing towards the provision of additional housing, particular affordable housing for local needs, also support the development of land adjoining or in close proximity to village settlement boundaries for affordable housing.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	CPRE Surrey Branch Guildford	<p>The increased figure for housing provision which is 31% higher than that specified in the draft SE Plan which we assume will be in line with that allocated in the final version when it is published. It is hard to imagine that the annual target of 422 houses per annum can be achieved at a time of recession and credit crunch. The most recent economic forecast for 2009 is a fall in GDF of 4% with unemployment at 3 million by the end of the year. CPRE objects strongly to the targets set being merely regarded as minimum levels.</p> <p>Surprised that this "Further Options" document has been released before the SHLAA is available and also the Green Belt and Countryside Study. Until these are made public, it is hard to comment definitively on housing distribution issues. We have, however, a major concern as to how windfall sites will be handled when forecasting housing targets in the next 10 years and beyond.</p> <p>In the light of the delay in publishing details of the Town Centre Area Action Plan and Slyfield Area Regeneration Project (SARP), phasing is going to be a major problem at Guildford, where so many substantial projects are postponed (eg Civic Hall, Railway Station, Bedford Road etc). We would object strongly if Green Belt land was sacrificed to building prematurely because development is held up on previously developed land through financial or planning problems.</p> <p>We do not accept the concept that Green Belt land should be released because other more suitable urban sites are not yet available or ready for housing development. Environmental constraints on development should be supported by this policy regardless of the speed with which building land elsewhere becomes available.</p> <p>We support the view that the first priority is to build more affordable housing of the right type. The oversupply of single bedroom flats built for investment purposes will presumably reduce now. We agree that in exceptional circumstances limited expansion beyond a village settlement may be permissible in rural areas, as allowed for under PPG2, provided it is to meet local need which is usually for 2 or 3 bedroom homes. We doubt whether this will be "an important contribution" in this context as only small scale development, normally comprising a few units, would be acceptable. We maintain that any village development (or urban for that matter), regardless of whether it is affordable or not, should be sensitively designed so that it fits in with its surroundings in terms of distinctive identity, character, and setting.</p> <p>We are surprised that no reference is made to the impact of development at the University of Surrey campuses in terms of housing availability and sites suitable for housing development in the town.</p>
	(a.)	Cranleigh Road Area Residents Association	<p>Para.1 - oppose the housing target of 422 new dwellings p.a. until 2026 as imposed by the draft SE Plan. Unrealistic, arbitrary and the root cause of risks to overdevelopment of the Town Centre, threat to the Green Belt and risk of building on flood plain. Remove specific targets from Core Strategy; stay with principles.</p>
	(a.)	Crownhall Estates	<p>No; you have placed too much reliance upon land in urban areas which are unlikely to be brought forward for development eg. Guildford Station. This is a technically very difficult project to execute in a good housing market, hence why 2 developers have failed to proceed; add in your affordable housing enhanced % and infrastructure tariff there is 0% likelihood of a scheme of this nature being successfully implemented.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Downsedge Residents' Association	(e) Preface the present text of the first paragraph with “If the Secretary of State’s proposals on the South East Plan are implemented...” Second paragraph (d) Add at end “and its infrastructure requirements”. Third paragraph: Remove references to sub-regions but keep general sense. Fifth paragraph (d) Add a sentence on the following lines: “There will be a presumption against the demolition of well preserved family houses.” (a) Depends on the continuation of regional planning and, in particular, on the implementation of the Secretary of State’s proposals on the South East Plan. If regional planning is abandoned or the Secretary of State’s proposals are not implemented there will need to be a rewrite. (a), (e) Delete words in brackets in 9.9.
	(a.)	Drivers Jonas on behalf of CEMEX	CEMEX supports Policy CP2 'Housing Provision and Distribution'. In particular, CEMEX supports the reference to the identified village settlements contributing towards the provision of additional housing and the development of land adjoining or in close proximity to village settlement boundaries.
	(a.)	Effingham Parish Council	Support this. It is clear that the provision of affordable housing is one of the top priorities of the Council. However planning applications for affordable housing should be subject to the same planning controls and procedures as other developments. Parish councils and local people should be given the chance to review, revise and if necessary object to an affordable housing planning application.
	(a.)	Government Office for the South East	• GOSE recommends inclusion of a distribution table summarising the broad geographical locations for future housing, economic growth including retail, and infrastructure including green space. Highlight strategic foci for development. Discussed other LPA examples.
	(a.)	Guildford Business Forum	Support this policy and its recent revision following inclusion of the South East Plan updated housing requirement. The provision of sufficient housing and the opportunity for everyone to have a decent home is a very important national objective. GBF notes the housing numbers for Surrey. These provide a greater likelihood that there might be sufficient provision of housing, particularly affordable housing, for employees of the businesses within the borough which are so important for the continued prosperity of the Borough and it's inhabitants. The South East Plan published today recommends 35% affordable rather than the 40% the Council proposes. The policy states that sites listed in the SHLAA will be prioritised for allocations by constraints and location, taking into account the type and timing of development. However, in the context of the South East Plan, the release of green field sites needs to be considered, through a process of green belt review, and that this review should include consideration of land to the south west of the town
	(a.)	Guildford Cathedral	The dean and chapter support this policy and its recent revision following inclusion of the south east plan updated housing requirement.
	(a.)	Guildford Constituency Labour Party	Support this but “local” with reference to village settlements needs interpreting broadly to mean local to Guildford Borough, not to the particular settlement.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Society	<p>Delete figures and instead provide a framework for the delivery of targets set in the SE Plan. The SE Plan may change before the Core Strategy. The Local Development Framework should not duplicate the SE Plan. Suggest first sentence is replaced by recognition that the Borough will provide homes to meet the housing targets set.</p> <p>Change the second sentence of the third paragraph and the fourth paragraph of this policy. Whether a site is in the “town centre”, the “urban area” or a “village settlement” is too crude an indicator of its suitability for housing provision. On some sites within the town centre new housing, sometime at relatively high densities, will be appropriate. In other cases, it will not be an appropriate use of land or more modest densities will be appropriate. Within the town centre, there is a need to create amenity space, provide space for (flood) water, respect heritage and character, provide non residential facilities and avoid over-cramming. Proximity to transport links and the town centre is but part of sustainability.</p> <p>It would be very harmful to character and environmental quality to target intensive redevelopment in many parts of the so called “urban area” which includes the garden suburbs and terraced communities, as described in the Landscape Assessment.</p> <p>Some sites may be identified in village settlements near a station and shops which are suitable for more significant housing provision. Sensitive case by case decisions based on the principles of sustainable development are called for.</p> <p>The key factor is not whether the site is in one of the “areas” proposed but whether a suitable site is available or can be created. The focus should be on key sites, identified through the Site Allocations process, regardless of what “area” they are in.</p> <p>Paragraph 3 refers to “priority for allocation”. More emphasis should be placed on reliance on the allocation process in identifying appropriate sites and indicative densities regardless of what “area” land is in. Given the significance of windfall applications within the borough, it is important to emphasise the intention that targets should largely be met through allocated sites and that cramming at inappropriately high densities on windfall sites is to be avoided whatever “area” the land is in.</p>
	(a.)	Highways Agency	<p>Support the approach taken in this policy and aware that some modelling work has been undertaken. Would like to review this modelling as well as the SHLAA document upon its publication for public consultation.</p> <p>Recommend the close monitoring of housing land supply. This will help to ensure that any potential problems with housing land supply are identified at the earliest possible stage to ensure the most sustainable alternative option can be found, this should aid in alleviating any potential need for development on greenbelt land.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Member of the public	<p>"Green Belt land will be protected from inappropriate development unless very special circumstances apply". This wording is too easygoing because it does not seek to define "inappropriate" or "very special circumstances" and there is a risk that these will be construed subjectively or too conveniently. The policy should be that green belt land will be totally protected unless there is absolutely no alternative to the development proposed. The maintenance of the green belt in tact up to now has been a great achievement which has often called for very difficult decisions in the past. If the starting point is "we cannot build on green belt" it calls for much greater effort in seeking out alternatives - which do exist. If the starting point is that there are circumstances in which green belt status can be put aside, no such effort will be made. Current intentions may be well placed but subsequent decision-makers may see it differently. The green belt once lost will never be reinstated. It will be lost for good.</p> <p>Such a policy, to allow the green belt to be steadily eroded, has almost no support and should not form part of any democratically decided policy. Even those people who might occupy houses built on green belt agree that they would prefer them not to be the cause of green belt destruction. So there should be a high requirement to exhaust every possible alternative first, including not doing the building at all.</p>
	(a.)	Member of the public	<p>Village settlement boundaries should not be extended if doing so encroaches on green belt land. The wording of the fourth paragraph builds in a proviso of "sensitive design" which would soon become a justification. The policy in action will become "as the proposed development is sensitively designed" it is acceptable. Our villages, which are charming because they have been kept small, will never be as pleasant again. This cannot be the best policy we can get: it should be that village settlements will not be extended into the green belt unless it has been demonstrated that absolutely no alternative exists. This is the only way to guard against lax interpretation in the future.</p>
	(a.)	Member of the public	<p>Object - While the housing figures [422] quoted are from the SE Plan, it remains highly likely that during this plan period the SE Plan will be amended. This will, with the text here, involve formal amendment of the Guildford Strategy. A Strategic document of this kind should content itself with referencing the 'SE Plan or its successor', and then, for convenience, put the 422 figure in a footnote.</p> <p>Clarify - Does the 422 figure include housing on 'windfall' sites?</p>
	(a.)	Member of the public	<p>I fully support urban regeneration and look forward to more details of the plans for Slyfield. I would also like to see an enhancement for Bellfields and Park Barn. Bearing in mind the changing size of families, is that land being put to the best use?</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	MJ Gleeson Group	<p>In accordance with PPS12 the role of the Core Strategy is to ensure the delivery of sustainable communities whilst facilitating the aspirations of the Council for the future of the Borough. With regard to this we support the Guildford Borough Core Strategy and the methodology used to address the requirement to make provision for additional residential within the District. We support a focused delivery scheme for the District in compliance with PPS12. It is for this reason that we support the provision of residential development at Chilworth. The settlement of Chilworth has an existing function as a sustainable settlement and as such has existing community infrastructure which would support, and could be enhanced by additional residential development, as identified at Strategic Objective MSG1 and MSG2 of the Guildford Core Strategy.</p> <p>Chilworth is regarded as a sustainable location due to its accessibility to facilities, availability of employment opportunities, and accessibility to public transport which serves the settlement and provides a frequent and effective service to neighbouring settlements and Guildford where high order services can be accessed.</p> <p>We are pleased to be supporting the provision of residential development within Policy CP1 of the Core Strategy, which should go towards addressing the high levels of housing need and affordability across the Borough. It is for this reason that we support the proposal by the Council within the Core Strategy to adopt a growth strategy to deliver units within Guildford and across the villages within the London Fringe sub-region. We would like to see a greater degree of detail with Policy CP2 to identify which settlement will accommodate growth. Within Policy CP2 we would like to see a proportion of these dwellings allocated to Chilworth to ensure that the housing needs of the settlement are addressed.</p> <p>As outlined within the Sustainable Communities Scheme residential development would contribute towards the existing services and social infrastructure within the District, which we believe is particularly important in Chilworth. For this reason we suggest that a small scale Greenfield allocation is made at Hornhatch Farm, New Road, Chilworth as the settlement is suitable for accommodating residential growth.</p> <p>As outlined above it is important to ensure that market and affordable housing is allocated through the small scale Greenfield sites allocation in settlements such as Chilworth to ensure that sustainable settlements which have important social and employment functions are identified, as an increase in residents would arguably enhance the quality and prosperity of the settlement.</p> <p>We would encourage a proportion of the small scale sites to be allocated to the Borough's settlements such as Chilworth to encourage a sense of community and importantly securing inward investment across the District, and not only focusing upon the larger settlements where strategic residential growth is proposed and supported through the Core Strategy.</p> <p>In addition it is particularly important to recognise that the South East RSS within Policy H1 says that the housing numbers identified are a minimum and that it is for the Local Authority to prepare plans and strategies to ensure the delivery of the minimum requirement but can exceed the minimum where appropriate within their Local Development Document.</p> <p>We support the Councils methodology in providing options for growth which should provide a deliverable provision of housing. We are concerned that the Core Strategy may not be in accordance with PPS12 if it cannot be demonstrated that contingencies have been incorporated into the plan. For this reason if the plan only accommodates the minimum housing requires the plan may be found to not be compliant with PPS12 which requires flexibility to ensure the minimum provision is met.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>We are concerned that the Core Strategy does not demonstrate sufficient flexibility to ensure that the minimum housing requirements set by the South East RSS can be achieved during the plan period. In order to ensure delivery across the plan period we believe that provision for development across the smaller settlements and at Guildford is the most deliverable and sustainable option for providing the required housing growth for the Borough across the plan period.</p> <p>We agree with the provision of the suitable urban extensions at Guildford, however we would like to see a proportion of the small scale Greenfield sites allocation attributed to Chilworth within the supporting text of Policy CP2. As stated earlier in our representations Chilworth is a sustainable settlement which has education and employment facilities, public transport services and existing social infrastructure.</p> <p>In our opinion Chilworth is arguably the most sustainable of the smaller settlements and would benefit from small scale housing growth in accordance with the SE RSS and would assist in the provision of delivering the housing numbers required for Guildford by the SE RSS and referenced at paragraph 9.7 of the Guildford Borough Core Strategy.</p> <p>In conclusion Greenfield allocations provide an important role in delivering housing to smaller communities which enable and enhance the provision or enhancement of social infrastructure, highway infrastructure and the delivery of affordable housing to existing communities. For this reason we consider that Greenfield sites within the smaller settlements such as Chilworth should deliver a proportion of which to be delivered.</p>
(a.)		National Trust	<p>Support the provision of affordable housing to meet local needs within villages in rural areas. However we believe that development adjoining or in close proximity to settlements, ie greenfield development, should only take place where there is no adverse impact on either the settlement itself, including its setting, or the surrounding rural area. This is implied in the supporting text to Policy CP13 but needs to be explicitly stated as a criterion in the Policy itself.</p>
(a.)		RPS on behalf of Surrey Police Authority, College of Law and Artington Court	<p>Difficult to evaluate how level of housing provision of 422 from unpublished Strategic Housing Land Availability Assessment. 422 should be seen within the context of the recommended figure for the South East of 33,125. This in turn should be viewed within the context of the 2007 Housing Green Paper. No reference is made to this within the Core Strategy. PPS3 referred to, references need to be made in the Core Strategy.</p> <p>Information given on projected household levels in the South east which is important information that should form part of the evidence base but is not referred to in the Core Strategy. Panel Report referred to increased housing provision. Guildford consistently sought lower housing figures.</p> <p>Secretary of State issued her proposed changes should be treated as a minimum. There is nothing therefore to prevent Guildford from considering the emerging evidence (such as the SHMA) and looking to allocate higher levels of housing based on identified local need.</p> <p>In response to the consultation questions to Policy CP2 – Housing provision and distribution (page 32):- do not agree with the approach of this policy. Changes need to be made. Difficult to see how this Strategic objective MSG6 can be met unless additional housing is provided for, including a wide range and type of housing, located closer to the main employment sources in Guildford.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Shere Parish Council	<p>We are concerned about the sentence “Identified village settlements will also make an important contribution towards the provision of additional housing, particularly for affordable housing for local needs. Where required, land adjoining or in close proximity to village settlement boundaries will be considered for allocation to meet identified local affordable housing needs, provided that any development can be sensitively design in relation to its surroundings.” This confuses issues. It strengthens the policy of building in identified settlement areas, but makes it appear to be a policy about building locally needed affordable housing. If on the other hand it placed more of an onus on building within the settlement area being for locally needed affordable housing it might be an improvement on the current situation. There are two criticisms here, one is of the policy of relying on settlement areas for substantial amounts of building (an “important contribution”), the other is of the poor drafting which would give much room for argument in planning inquiries. Since there was an option considered at an earlier stage and rejected which said “to meet the housing target entirely in the urban area and identified village settlements” it follows that some housing would be allowed under this policy in areas where it would not have been allowed under the rejected policy.</p> <p>It needs to be quite clear whether the paragraph 9.9 refers only to locally needed “affordable” housing. In the absence of such clarification the meaning of “encouraged” also leads to uncertainty. Does it mean that housing that does not meet local needs will be allowed, but housing that does meet local needs will be encouraged? If so how will this be reflected in a system responding to applications? What does “sustain” imply? Does it only refer to local needs? There is also the question of what “and rural communities” means. If paragraph 9.9 is not just about locally needed “affordable” housing, it becomes more important as a question. Does this mean that there will be a vague class of “almost settlement areas” in which building might take place if applicants argue enough? There are some potential examples in this parish.</p> <p>(c) As stated under CP1, we consider that paragraph 9.9 fails to conform with the South East Plan, which is summarised in your explanatory text (on page 17) as saying “The residual area is rural in character and significant development is not expected to be accommodated in this area.” We do not consider that these are areas that could make an “important contribution” to the supply of additional housing, although it may be appropriate for them to make some contribution to the provision of locally needed affordable housing in the future.</p>
	(a.)	Surrey County Council	<p>Support the Borough’s intention to provided a net increase of some 422 dwellings per annum within the Borough between 2006-2026, in accordance with the South-East Plan, broadly as set out with the South-East Plan sub-regions affecting the Borough. Note the intention to assess land adjoining or in close proximity to identified rural settlements for particularly local needs for affordable housing. Suggest that only small-scale development normally comprising a few units, would be acceptable.</p>
	(a.)	Taylor Wimpey	<p>Support the policy which reflects the thresholds and strategy set out in the South East Plan. Should housing figures be increased in the SE Plan, we would support an increase in housing provision to reflect that increase. The strategy of focussing housing growth on Tongham and Ash in the Western Corridor Blackwater Valley sub-region, and in Guildford within the London Fringe sub-region is also supported.</p> <p>Support the rejection of the urban intensification option. The proposed strategy will enable planned growth to occur in the most sustainable locations and help to meet local housing demand</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Terence O'Rourke	<p>Support the statement within policy: "The spatial distribution of housing in Guildford Borough will be broadly in line with the proportionate housing requirement split within the sub regions, set out in the South East Plan".</p> <p>The use of the word broadly provides sufficient flexibility that will help housing need to be satisfied within Guildford, through allowing limited transfer of housing targets between the different sub regions applicable to Guildford. This proactive approach reflects the guidance advocated by PPS3 that housing delivery must not be impeded.</p> <p>The further options document included, "Small scale sites in the Countryside beyond the Green Belt will be considered for allocation where they adjoin the urban area boundary and can be sensitively developed (for affordable housing)".</p> <p>The text establishes that the periphery of Ash represents a unique opportunity to facilitate development, given the significant level of constraints existing around other areas of Guildford and this must be recognised through the Core Strategy, in relation to both affordable and market housing.</p> <p>Failure to recognise this opportunity risks housing delivery being impeded or forcing unnecessary land to be developed in the Green Belt, contrary to national guidance.</p> <p>(a) Do you agree with the approach of the policy/section? - No</p> <p>(c) Are you satisfied that the approach / section / policy reflects national and regional policy and addresses key local issues facing the borough? -No</p> <p>The following text should be inserted into the Core Strategy: "Appropriately scaled sites in the Countryside beyond the Green Belt will be considered for allocation where they adjoin the urban area boundary and can be sensitively developed"</p> <p>Guildford Core Strategy Further Options Document Paragraphs 9.7-9.11. Paragraphs 9.7-9.11 of the "Further Options" document should be amended to reflect the wording of Policy CP2. At present the supporting text makes no reference to the definitive wording of policy CP2, which acknowledges there can be limited transfer of housing numbers between the housing targets established for the sub regions applicable to Guildford. This apparent conflict between Policy CP2 and the supporting text should be clarified to overcome uncertainty and equip Guildford's Core Strategy with sufficient flexibility and soundness to deliver its housing targets, against the context of tight development constraint.</p> <p>Relevant Core Strategy consultation questions: (d) Have we missed anything you consider is important? - Yes</p> <p>(e) Are any changes to the supporting text necessary - Yes</p> <p>Required change: The first sentence of paragraph 9.11 should be deleted to avoid conflict between the supporting text, Policy CP2 and the intent of the South East Plan in this respect.</p>
	(a.)	Thames Water	<p>Would need an indication of the levels of housing being proposed to comment on the water and sewerage infrastructure requirements of the various options on which sites so that we could model the impacts on the existing systems. However, in very general terms it is quicker to deliver infrastructure on a small number of clearly defined large sites than it is in a large number of small sites, which may not be clearly defined.</p>
	(a.)	Tribal MJP	<p>Lacks flexibility in terms of developing sites that have not been identified in the SHLAA or that fall within the guildford town centre or an identified village settlement. The council should accept that they may not be aware of every site that might at some point become surplus to requirements and which could be suitable for development. Such sites might be located on the fringe of existing development areas or within major development sites within the green belt and could support additional housing due to existing infrastructure.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Trustees of the Rundle Brendon Will Trust	The consultation document and core strategy chose to extend the location of this provision to the full extent of the London fringe within Guildford. We submit that this extension is in conflict with the measured provisions of the south east plan and is quite simply wrong.
	(a.)	University of Surrey	Support this policy and its recent revision following inclusion of the South East Plan updated housing requirement. The provision of sufficient housing and the opportunity for everyone to have a decent home is a very important national objective. Welcome the housing numbers for Surrey. These provide a greater likelihood that there might be sufficient provision of housing, particularly affordable housing, for staff, students, and the employees of tenants of the Surrey Research Park. The policy states that sites listed in the SHLAA will be prioritised for allocations (through the site allocations and Town Centre Area Action Plan DPDs) by constraints and location, taking into account the type and timing of development. In the context of the South East Plan, the release of green field sites needs to be considered, through a process of green belt review, and that this review should include consideration of land to the south west of the town adjacent to the Surrey Research Park and the Manor Park campus.
	(a.)	Wanborough Parish Council	Concerned that more detail is required about how this policy will be implemented, as it is difficult to see how 8000 new homes can be provided without impacting on the Green Belt.
	(a.)	Westborough, Broadacres & District Residents Association	talks about house building @ 422 houses per annum as per the South East Plan. Hang on a minute, didn't GBC tell us they were firmly opposed to this plan so why are we now proposing to go along with it?
	(a.)	Woolf Bond Planning on behalf Martin Grant Homes Ltd	Supports Policy CP2 which provides for 422 new dwellings per annum within Guildford Borough during the Plan period 2006 to 2026 (8,440 dwellings in total), in accordance with the requirements of the emerging South East Plan (Proposed Changes – July 2008). Agree with the provisions of Policy CP2 which, within the London Fringe sub-region, gives priority for housing allocations/development to be directed to the Guildford urban area. Policy CP2 should be much more specific in identifying how and where housing is to be provided.
	(a.)	Worplesdon Parish Council	Very concerned about the following statement - Page 37 - New Evidence Studies: "If a five year supply of housing land cannot be identified in the urban areas and village settlements, the Green Belt and Countryside Study will identify the most sustainable location for Green Belt release in Guildford Borough." Why has the reference to development of the Green Belt in NE Guildford been removed? In the parish of Worplesdon only one field separates the village settlements of Worplesdon and Fairlands from the urban area. If building takes place at Liddington Hall Farm, or the donkey fields beside Tangle Lane it will result in the coalescence of the urban area and the villages, which is unacceptable and is contrary to the five purposes of the Green Belt as defined in PPG2.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(c.)	Barton Willmore	<p>The Secretary of State acknowledges that the overall level of housing provision recommended by the SEP is inadequate and fails to reach a level signalled by the evidence of need and demand for housing. In response the Secretary of State has added: "Local Planning Authorities are encouraged to tests higher levels of provision for housing through LDDs."</p> <p>PPS3 states that the amount of housing provision should be informed by evidence of current and future levels of need and demand for housing, and affordability levels. The evidence signals the need for an increase in the level of housing provision of at least 15-20% above the SEP minimum requirement:</p> <p>The SEP identifies a minimum housing requirement for Guildford Borough of 8,440 new homes.</p> <p>The most recent advice from the NHPAU proposes a region-wide target supply range of between 14.5% to 50% higher than the level proposed by the emerging SEP in order to address affordability in the South East. While this figure is not disaggregated to a local authority level, it provides a strong indication of demand/need pressures which, if applied on a prorata basis to Guildford would translate to a requirement of between 9,660 and 12,660 dwellings.</p> <p>Guildford's SHMA concludes that there is a net annual need for 1,194 affordable homes. To meet this requirement an increase of about 53% above the SEP minimum requirement is needed.</p> <p>It is clear that the severe affordability problem will not be addressed unless provision is made for a level of housing significantly above the minimum figure set through the SEP.</p> <p>Sustainability Appraisal and assessment of infrastructure needs has been carried out as part of work to underpin the South East Plan allocation. We urge the Council to ensure that all options for housing provision, including the testing of higher levels of provision and a local selective review of Green Belt boundaries is completed. This should be subject of Sustainability Appraisal and appropriate public consultation.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>Whilst setting an appropriate level of housing provision must be a matter of judgement, the evidence presented above provides a 'range' within which the level of housing provision above the SEP minimum level should achieve. PPS12 states that it is essential for the Core Strategy DPD to make clear choices about where development should be located. Difficult decisions must not be deferred to subsequent Development Plan Documents (DPDs) i.e. Site Allocations DPD.</p> <p>The Core Strategy does not provide a clear strategy for where new housing will be delivered. This is a particular concern for the London Fringe part of the Borough where the emerging SEP requires at least 7,940 dwellings to be delivered during the plan period (around 94% of the Borough's overall requirement). This part of the Borough includes the Guildford Regional Hub and all of the identified smaller settlements. Whilst the SEP signals that Guildford should be the focus for new development the Council should plan to deliver an appropriate level of development elsewhere at other sustainable locations within the Borough.</p> <p>The Core Strategy should be clear regarding the quantum of housing development to be provided at Guildford should also indicate the level of provision to be provided in the London Fringe part of the Borough away from Guildford. This should include a specific quantum of development to be delivered at East Horsley. This should include a clear commitment to the release of land from the Green Belt to the north of East Horsley.</p> <p>Guildford Borough's minimum housing requirement comprises separate minimum figures for the Western Corridor and Blackwater Valley (WCBV) and London Fringe Sub-regional parts of the Borough (25 dpa and 397 dpa respectively). The Council must ensure that these minimum levels of provision within each of the part of the Borough are at least met.</p> <p>If the Council seek to offer a greater 'proportion' of housing within the WCBV Sub-region, the appropriate approach is an increase the number of dwellings, above the minimum requirement, in that part of the Borough. This must not, result in a reduction below the minimum requirement in the London Fringe part of the Borough. The same could apply if a greater proportion of housing is to be delivered within the London Fringe.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>If at any time during the plan period the Council is unable to maintain a sufficient 5 year supply, the release of land from the Green Belt will be considered. The Core Strategy does not set out what would trigger such a release of which sites currently within the Green Belt would be released. This approach appears to suggest that land would not be removed from the Green Belt through the plan process but that “inappropriate” housing development in the Green Belt would be brought forward if justified by very special circumstances (shortfall in housing delivery). This approach fundamentally fails to make sufficient provision for housing during the plan period, and up to 2031. Furthermore, there is a danger that land could not be brought forward quickly and could result in less sustainable development coming forward to meet any shortfall that could occur.</p> <p>The Council has yet to publish the SHLAA which must identify sufficient specific sites to deliver housing for at least 10 years from the date of adoption. In advance of the Council’s SHLAA being published there is insufficient evidence to demonstrate that there is a sufficient supply of deliverable and developable sites to meet the minimum housing requirement for at least 10 years (and preferably for 15 years) from the expected date of adoption. Therefore, in order to identify sufficient land to meet the requirement a local selective review of the Green Belt will be required. Where a review of Green Belt is completed, the emerging SEP states that where such a review is completed local authorities should be satisfied that a further review would not be required before 2031</p> <p>A more appropriate mechanism for “releasing” land immediately adjoining East Horsley currently within the Green Belt for housing development is for the LDF to remove this settlement from the extent of the Green Belt (i.e. remove its “washed over” status and inset the settlement from its extent). This would reflect the higher order status of East Horsley as a sustainable location where limited expansion beyond the existing settlement boundary is appropriate. A review of the detailed settlement boundary should then be completed to incorporate land off Ockham Road North to the north of East Horsley for an appropriate level of residential development (a submission to the Council’s SHLAA has been made on behalf of our client in December 2008).</p> <p>The Core Strategy must confirm that a review of the Green Belt will be completed through the Site Allocations DPD in order to identify sufficient land for housing development and the review will include land to the east of Ockham Road North, immediately adjoining the northern edge of East Horsley.</p>
	(c.)	Burpham Community Association.	<p>Guildford and the surrounding areas are already groaning under the number of residents and the transport problems. The schools, hospitals, and transport systems can not cope with the current load. Increasing the number of residents will only enhance this problem. Saying that the infrastructure will be developed according to need is unlikely to happen before or even at the same time as the development, resulting in a period of even worse congestion etc. Instead of defining the number of houses per year, the plan should work in conjunction of the development of the infrastructure, hospitals, schools, can be developed to accommodate the new housing and only happen when all other factors are ready is prevention rather than firefighting.</p>
	(c.)	Carter Planning Limited	<p>No – The Policy should allow for urban extensions not just for affordable housing since these may be more easily assimilated and be more sustainable than large scale Greenfield housing growth.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(c.)	Guildford Society	<p>The table on pages 121 and 122 of the Consultation states which Local Plan policies it is intended to replace with Core Strategy core policies.</p> <p>H4: Housing in Urban Areas, which has strong protective clauses. Replaced by CP2 in part, which refers to the Site Allocations and TCAAP DPD's. None of the protective clauses of H4 are retained. Part of H4 is due 'to be reviewed and replaced later'. Need to clarify that this part includes items 1., 2., and 3. of H4.</p> <p>H5: Retention of Existing Housing Stock. Net loss of housing and specialised housing forbidden. Replaced by CP2 in part. 'Council will resist ... net loss of housing stock'. Protection of specialised housing in H5 is covered in CP10: Homes for All.</p> <p>Page 126 of the Consultation lists seven Policies that 'were not saved for future use', and hence will not be replaced: H1: Housing Provision (for 1998 to 2006). This is replaced by CP2: Housing Provision and Distribution (for 2006 to 2026).</p>
	(c.)	Member of the public	<p>p.33, para 3, '...Identified village settlements will also make an important contribution towards the provision of additional housing, particularly for affordable housing for local needs.'</p> <p>This means there must be a clear understanding and definition of what those local needs are. It should not be confused with overspill from other areas.</p>
	(c.)	Trustees of the Rundle Brendon Will Trust	<p>We comment that the core document does not seem to meet this requirement (SP5 of the SE plan). The consultation document para. 9.3 refers to the monitoring and delivery of the supply of housing land and indicates policy in the event of shortfall. We submit that policy CP2 needs clarification to express this important point.</p>
	(d.)	Barton Willmore	<p>Whilst setting an appropriate level of housing provision must be a matter of judgement, the evidence provides a 'range' within which the level of housing provision above the SEP minimum level should achieve. It is essential that the Core Strategy allows for flexibility to ensure a sound Core Strategy, moreover flexibility is a pre-cursor to delivery.</p>
	(d.)	Barton Willmore	<p>Policy does not sufficiently reflect the requirement to deliver housing for which there is identified need. PPS3 is founded on the principle of the delivery of much needed housing development to provide for identified need. The SHMA identifies a significant need for market housing, PPS3 requires any shortfalls in the delivery of market housing to be addressed. The SHMA also identifies a significant need for affordable housing.</p>
	(d.)	Barton Willmore	<p>Concerned that Policy provides no local guidance regarding the distribution of new housing in the Borough and that the Core Strategy does not provide a clear strategy for where new housing will be delivered. This is a particular concern for the Western Corridor and Blackwater Valley where a large area suitable for urban growth is located i.e. 'Countryside Beyond the Green Belt'.</p> <p>The Core Strategy should be clear regarding the quantum of housing development to be provided at Guildford and should also indicate the level of provision to be provided in the other parts of the Borough. This should introduce flexibility into the Core Strategy should for any reason housing development in Ash and Tongham Urban Area not come forward as anticipated.</p>
	(d.)	Carter Planning Limited	<p>Add Where required land adjoining or in close proximity to village settlement boundaries will be considered for allocation to meet THE BOROUGH'S HOUSING NEEDS and to meet local affordable housing needs.....</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	East Horsley Parish Council	Housing provision in East Horsley should be tightly restricted. The number of available places at our local schools and doctor's surgery should be consulted before allowing any new homes. To sustain communities across generations we support small Affordable Housing schemes to enable offspring to stay in, and around, the villages they were raised, subject to adequate infrastructure provision. Affordable housing for key workers is highly desirable; but this should be small-scale housing provision only.
	(d.)	Mount Green HA	Suggest policy be more explicit by what is meant by 'affordable housing', especially regarding intermediate tenure types and their relation to meeting housing need as evidenced by the SHMA
	(d.)	SEERA	Comment as to how much housing development is intended to happen, where and when, the need to set parameters for subsequent LDDs and that the current proposed strategy of not amending the Green Belt boundary is the most appropriate one. The reference in the 'green box' to Policy SH5 of the SEP is presumably an error. The relevant policies are LF3 and WCBV3.
	(d.)	Smiths Gore	Comments provided above in relation to Policy CP1 are also considered to be relevant to this Policy. □ It is also considered that the wording of Policy CP2 in relation to village settlements should be altered so that development is not seen as something which villages are capable of accommodating, but rather as something which can ensure the long-term viability and vitality of such settlements, in accordance with the policy thrust of PPS7.
	(d.)	The Clandon Society	We believed that GBC were opposed to the house building targets set out in the SE Plan. Should GBC be looking to argue against such targets in its Core Strategy? Are you satisfied that the approach/section/policy reflects national and regional policy and addresses key local issues facing the borough? p.33, para.3, '...Identified village settlements will also make an important contribution towards the provision of additional housing, particularly for affordable housing for local needs.' This means there must be a clear understanding and definition of what those local needs are. It should not be confused with overspill from other areas.
	(d.)	Trustees of the Rundle Brendon Will Trust	Policy CP2 states 'Provision will be made for an annual average net increase of 422 new dwellings per annum within Guildford Borough between 1 April 2006 and 31 March 2026'. We submit that this is a limited provision that does not comply with the South East Plan. We submit that the consultation document is seriously defective and unrealistic. It needs amendment. The studied avoidance of any reference to the south east policy that the housing requirement figures are treated as a minimum is irresponsible, misleading and wrong.
	(d.)	Vail Williams	The release of the South East Plan should be acknowledged within the Core Strategy, including the revised targets specified.
	(d.)	Vail Williams	The SHLAA must be finished and policy CP2 reviewed prior to submission of the Core Strategy to the Secretary of State.
	(e.)	Barton Willmore	' . . . Within the Western Corridor Blackwater Valley sub-region of Guildford Borough, priority will be given to sites located within the Ash and Tongham Urban Area. Where, in the event that a deliverable supply of housing land in this area cannot be demonstrated for the following five years, sites located in 'Countryside Beyond the Green Belt' adjacent to the settlement boundary will be considered'.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Boyer Planning on behalf of the Diocese of Arundel & Brighton	<p>The scale of housing provision identified in the first paragraph will need to correspond to the figure in the finally approved South East Plan, and to be expressed as a minimum. This is because the provisions in the South East Plan are recognized to be substantially below the forecast growth of households in the Region. So far as Guildford is concerned this is most recently demonstrated by comparing the 2006-based household projections, which show a 20.4% increase in households over the period 2006-26, with the earlier 2004-based projections which showed only a 16.7% increase.</p> <p>The text of the penultimate paragraph which is concerned with village settlements needs to adopt a clearer and more flexible approach to settlement boundaries, recognizing that these will be defined in the Site Allocations DPD. Propose that the second sentence of the fourth paragraph in Policy CP2 is amended.</p>
	(e.)	Holy Trinity Amenity Group	<p>Object to the statement that "...priority for allocation will be given to the Guildford Urban Area, with specific focus on Guildford Town Centre as the most sustainable location." The Town Centre, as defined in the draft Town Centre Area Action Plan, is already crammed with buildings, with inadequate open space. While some additional housing can be provided here this can only be a small proportion of the total required. Suggest replace with "...with specific focus on those areas with easy pedestrian access to amenities". This will enable new development to be more widely spread, and will reduce the extent of cramming imposed on the town centre.</p>
	(e.)	Home Builders Federation	<p>The policy assumes a base date for the plan, and for housing provision, of 2006. This is contrary to national guidance set out in PPS12 which recommends that a base date is set to coincide with the adoption of the plan. As set out in the Council's proposed timetable this would be better set at September 2010. However, to allow for consistent monitoring data the practical base date for the plan should be April 2010.</p> <p>If this is not updated, at the very least the plan should contain the factual numerical housing completions of the period 2006 to 2010 in order that proper provision can be made for any shortfall in housing provision which has occurred in that period.</p>
	(e.)	Trustees of the Rundle Brendon Will Trust	<p>We suggest that the text of policy CP2 is changed to begin 'Provision will be made for a minimum annual average net increase of 422 new dwellings per annum....' and that para. 9.6 of the consultation document is amended to begin 'The draft south east plan requires the minimum provisions of 8,440 new homes in the borough....' In seeking to target some additional growth towards Guildford and following the examination in public the panel reported that 'there are significant environmental constraints to the expansion of the town to the south, south east or south west. Expansion to the north is limited by SPA (para 20.57) The core strategy does not mention these important provisions specified to the north east of the town. This omission is a serious defect in the core strategy. The policy on village settlements appears to be unbalanced. The main focus would seem to be on squeezing in more houses and less on the shape and pattern of the village settlements. The village settlement boundaries appear to have been drawn tightly round existing development and without rounding off some might fall short of their potential. We suggest that the CS might be amended to incorporate a more creative and positive approach.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
CP3	(a.)	CGMS consulting	It is being prepared using evidence which is not finalised or publically available and is thus not 'robust and credible'; -the policy is contrary to PPS12, which states the 'choices made by the plan are backed up by the background facts'; -the policy is contrary to PPS4 which requires local authorities to provide an up to date evidence base; and -the policy is contrary to the SE plan which requires local authorities to have an up to date review of employment land.
	(a.)	CPRE Surrey Branch Guildford	Recommend that the first paragraph deleted from the policy since it is not to do with the local economy. Object to the way in which the role of education is not classified as a business. It is certainly critical to the Guildford economy. Major educational establishments and schools should be required to recognise their responsibility in terms of traffic generation. Note the greater emphasis placed on the local economy as a priority in this "Further Options" document compared to the previous "Preferred Options" publication. Maintain that a successful spatial strategy depends on equal priority being given to economic, environmental and social aspects so that an integrated approach is established which ensures the overall well being of the community.
	(a.)	Crownhall Estates	No. You suggest working with the local business community but have not identified future land for expansion other than the hitherto unproven Slyfield Area Action Plan which has not been the subject of proper independent analysis other than by the stakeholders. Nowhere do you place any emphasis upon the needs of small businesses. Lots of words without any proper commitment.
	(a.)	Downsedge Residents' Association	(a), (e) The figures for additional jobs have been queried; their source needs to be rechecked. Remove references to sub-regions. Third paragraph (e) Replace "sub-region" with "area". Fourth paragraph (e) At end of first sentence add "but not in areas with poor access to public transport". (d) After "located within" in the third line, add "appropriate parts of the" [Much of the Guildford urban area is residential and unsuitable for new offices]. Paragraphs 9.14, 9.15. (e) Delete first sentence of 9.14 and other references to "sub-region". Paragraph 9.16 (e) Delete words in brackets in line 5. Paragraph 9.20 (d) Future proofing should also apply to retail.
	(a.)	Government Office for the South East	• Opportunity to strengthen plans for the rural economy.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Business Forum	<p>Support this policy which seeks to provide for an increase in employment as projected in the South East Plan, and ensure sufficient provision is made for existing and future economic growth. Welcome the safeguarding of suitably located existing employment sites for intensification, regeneration and/or expansion to meet future needs. Support the view of the University that Surrey Research Park should be recognised as one of a number of strategic business sites, which will be protected for business generating uses.</p> <p>It is appreciated that there is space for new employment development available on some of the identified strategic business sites, including unimplemented plots on the Surrey Research Park, and that redevelopment and intensification might create additional floorspace in some locations such as the town centre. The future of the local economy depends on the availability of a variety of types of business premises so that new businesses in particular can expand and grow without having to leave the area. That is why it is important to at least maintain and increase the level of supply.</p> <p>As part of a consideration of additional allocations for business, the potential for the extension of existing strategic business sites through the review of green belt boundaries should be given serious consideration in the context of a sustainable urban extension to Guildford, which might also provide land for other types of employment. If a particular site is poorly located and has buildings of poor quality unsuitable for current needs then it is right to consider its potential for other uses. However the plan should make provision for replacement floorspace in a more suitable location, through the allocation of additional land. Consideration needs to be given to the change in use of existing employment sites for residential development. This accords with the Core Strategy themes of sustainable redevelopment of existing sites and the need to provide flexible space to meet changing working practices. It would therefore be sensible to allow a change of use on existing properties and sites that are unable to provide flexible office space by their nature or position within the Borough, including their proximity to other class uses that may provide a more considered proposal for the area i.e new civic hall/cultural, leisure and residential quarter.</p> <p>The rejected option of allowing the loss of 20% poorly located employment land should be included within the policy to provide a flexible approach to changing needs and requirements of employers.</p>
	(a.)	Guildford Society	<p>Intensification should be qualified to make it clear this should be of a scale that is sensitive to the character of the surrounding area and properties of the site.</p> <p>Oppose proposal that “major office proposals will be located within Guildford urban area.” These should be located in the town centre or in clearly specified appropriate locations.</p> <p>Need to recognise the quality of the environment in Guildford, the distinctive character of the town and the quality of the housing stock as important in underpinning the economic success of the town. It is not just the countryside that is an asset to be respected and enhanced.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Highways Agency	Should employment sites be located in close proximity to the SRN, would require there to be careful consideration of likely employee travel patterns. There should also be the development of tailored demand management measures to reduce potential SRN impacts. Additional text within this policy should also note that developers will be expected to mitigate any residual SRN impact whether caused by a specific site in isolation or in combination with others. Generally supportive of the approach taken within this policy where employment areas are positioned in locations that are accessible by public transport within urban centres. These will be expected to encourage shift to sustainable travel models and so will potentially reduce the need to travel by car within Guildford. These choices can be formalised by the production of travel plans for both existing and new development. Supportive of reducing the need to travel as noted and recommends that there is a requirement for all new developments to develop travel plans.
	(a.)	Home Builders Federation	This appears to be a policy stance by the Council requiring specific elements of the Code for Sustainable Homes to be met by all new dwellings. It should, therefore, be included within a specific policy. Notwithstanding the above, HBF strongly objects to the suggestion that all dwellings should include a quiet room for a home office. This is not practicable in many cases (for example, in smaller dwellings, and is, in many cases, unnecessary).
	(a.)	Kingstons	Produced without reference to the Employment Land Review which was commenced 3 years ago and is still unpublished. How can you produce a meaningful Core Strategy when the employment needs are not fully available to the public?
	(a.)	Kingstons	Relies on new employment floor space being provided as part of the Slyfield Area strategic development. There is no guarantee that this will ever happen and certainly no indication when it will happen. In the meantime there is no attempt to allocate additional land. Even if this scheme did happen, it is unacceptable to rely on GBC as being the only provider of available "land". Given their constraints on having to get best value and market test land prices, it cannot be said to be "available" to the market generally.
	(a.)	Kingstons	Need to allow for the provision of leisure and accept that this may need to come from Employment Land.
	(a.)	Member of the public	Object: While the employment figures quoted are from the SE Plan, it remains highly likely that during this plan period the SE Plan will be amended. This will involve formal amendment of the Strategy. A Strategic document of this kind should content itself with referencing the 'SE Plan or its successor', and then, for convenience, put the relevant figures in a footnote.
	(a.)	Member of the public	The local economy can have a huge impact on residents and it is essential that local residents associations have formal links and contacts with Guildford Borough Council, as has local business through the Guildford Business Forum.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	<p>Supporting the local economy (page 3):- Agree in principle to the sentiments of the policy, cannot agree that the overall policy approach of the Core Strategy as currently drafted will assist in achieving these objectives. Alternative employment sites should have been considered. Fails to encourage employment opportunities and reducing car travel. Absence of a key element in the evidence base. Changes to the supporting text given. For the need for additional employment floorspace it is insufficient to await the results of the Employment Study or the Site Allocations DPD to address this issue. Surrey Police Headquarters and the College of Law should be considered. Comments made on paragraph 9.18 (page 37), paragraph 9.21 (page 37) and the Summary of the Interim Sustainability Appraisal Findings on page 38</p> <p>The Core Strategy has completely failed to embrace the most recent Government thinking as far as this key aspect of policy is concerned.</p> <p>The future needs of existing employers such as the Surrey Police and the College of Law have been completely overlooked and will be restrained by the existing policy constraints covering their sites.</p> <p>Inadequacy of Core Strategy evidence base as Employment Land Review is not due for completion until August 2009. No objection to strategic objective MSG7 (page 39) but it is difficult to see how this will be achieved. Strategic objective MSG1 (page 49) and MSG4 (page 49) is supported. Regrettable that the Policies within the Core Strategy will do little towards achieving these objectives.</p>
	(a.)	SEEDA	<p>It is important that the ELR is able to demonstrate that sufficient employment land is available for the plan period, and welcome the commitment within this policy to 'safeguard suitably located existing employment sites for intensification, regeneration and/or expansion to meet future needs, including appropriate growth of rural businesses'.</p> <p>Encouraged that the rejected options include those which would have resulted in the release of employment land for housing, however this remains an interim view pending the publication of the ELR.</p> <p>Welcome references to supporting innovation and enterprise, encouraging 'smart growth', flexible working, support for SME's and rural enterprises, and commitments to working with the business community and increasing skills levels within the borough.</p>
	(a.)	Shalford Parish Council	<p>Statement that GBC 'will seek to provide and safeguard employment land in appropriate locations'. This statement is of particular interest to Shalford, which experiences a continuing loss of small workshop and office premises in favour of residential development</p>
	(a.)	Solum Regeneration Partnership	<p>Support: Agree that employment uses should be directed towards Guildford Town Centre due to the high level of access to public transport.</p>
	(a.)	Surrey County Council	<p>Support Borough's approach to the creation of new jobs from safeguarding employment sites suitably located for intensification, and ensuring further commercial floorspace as part of the Slyfield area strategic regeneration.</p>
	(a.)	Tribal MJP	<p>Policy lacks flexibility and relies on all employment sites being previously defined. It therefore does not include sites that might become available as a result of being surplus to requirements. Economic stability of the borough is reliant on supporting a number of local centres and is reached through providing employment through a number of land uses. These include hotels, leisure and education. The policy fails to acknowledge these uses and focuses on office space and large employment sites to the detriment of other uses which contribute to employment generation.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	University of Surrey	<p>Support this policy that seeks to provide for an increase in employment as projected in the South East Plan, and ensure sufficient provision is made for existing and future economic growth. Welcomes the safeguarding of suitably located existing employment sites for intensification, regeneration and/or expansion to meet future needs.</p> <p>The internationally important Surrey Research Park should be recognised as one of a number of strategic business sites, which will be protected for business generating uses. In addition the University itself is a significant element in the regional economy, and is an engine for growth. It has seen student numbers increase and expects these to increase further in line with its strategic plan and vision for future growth.</p> <p>It is appreciated that there is space for new employment development available on some of the identified strategic business sites, including unimplemented plots on the Surrey Research Park, and that redevelopment and intensification might create additional floorspace in some locations such as the town centre.</p> <p>The future of the local economy depends on the availability of a variety of types of business premises so that new businesses in particular can expand and grow without having to leave the area. That is why it is important to at least maintain and increase the level of supply.</p> <p>If a particular site is poorly located and has buildings of poor quality not suitable for current needs then it is right to consider the potential for other uses.</p> <p>However the plan should make provision for replacement floorspace in a more suitable location, through the allocation of additional land.</p> <p>As part of a consideration of additional allocations for business, the potential for the extension of the Surrey Research Park through the review of green belt boundaries needs to be given serious consideration in the context of a sustainable urban extension to Guildford, which might also provide land for other types of employment.</p>
	(a.)	Wanborough Parish Council	<p>Supporting the local economy should be linked to public and private transport links. The ability of the Borough to develop Guildford as a hub and the projected increase in housing and jobs in outlying districts is flawed by the lack of the Borough's control over major (A31, A3 and A331) and minor roads</p>
	(a.)	Woolf Bond Planning on behalf Martin Grant Homes Ltd	<p>Note and support the changes to this policy from the previous consultation documents in terms of deleting reference to releasing some employment land and buildings to 'other uses' including that for housing. Support the provisions of Policy CP3 in safeguarding suitably located existing employment sites for intensification, regeneration and/or expansion to meet future needs and further maintain and enhance the settlements in the Borough, particularly the Guildford urban area. Agree that some employment generating development should be permitted in defined strategic locations, including where the locations promote the use of public transport.</p>
	(b.)	Guildford Cathedral	<p>Whilst the dean and chapter acknowledge that sufficient provision must be made for existing and future economic growth they consider that there may be opportunities to release employment sites for housing or other uses. A robust site assessments could enable release of the most appropriate sites. The dean and chapter would question why this option has been rejected.</p>
	(b.)	King Sturge LLP	<p>Preferred options suggested that the loss of poorly located employment land and buildings would be acceptable in certain cases. This should be reconsidered, as this does not necessarily result in a loss in employment opportunities, for example where a mixed use scheme can provide an element of cross subsidy to provide for improved employment premises.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(b.)	Vail Williams	<p>The boundaries proposed by the SARP area are insufficient to deliver a viable development when considering the host of deliverability issues such as flooding, highways, contamination and infrastructure which exist. It is also relevant that a significant tranche of the SARP land has long been earmarked for to incorporate the waste transfer project, which if delivered, will significantly reduce the quantum of development land available on the site. Because of this we question the weight being attached to the SARP area in the core strategy generally to deliver strategic housing and employment land.</p> <p>It would be more appropriate for the core strategy to also promote the development of small parcels of land in strategic locations next to existing employment areas which realistically can be delivered in the interim period before the SARP land can be realised. We strongly suggest that the wording is amended to allow for additional land holdings to come forward ensuring that the SARP land is not relied upon to be the primary provider of new employment land in the next ten years.</p>
	(c.)	Guildford Society	<p>The table on pages 121 and 122 of the Consultation states which Local Plan policies it is intended to replace with Core Strategy core policies.</p> <p>E1: Allocation of Business, Industrial and Warehousing Land E2: Redevelopment of Existing Business, Industrial and Warehousing Land in Urban Areas and Within Identified Settlements in the Green Belt. E3: Safeguarding Existing and Allocated Business, Industrial and Warehousing Land. E4: Restraint on Business, Industrial and Warehousing Employment Development. E5: Homeworking</p> <p>All replaced by CP3 Supporting the Local Economy. The E1 to E5 are highly planning oriented. CP3 is more holistic. E1 restricts new development to Slyfield and Ash Vale. CP3 extends this to sites in the Site Allocations and TCAAP if required. E3 has stronger wording on existing sites, and E5 on provisos on homeworking. CP3 has an admirable 'wish list': "The Borough will work with its partners ...". Note that this is another instance where the Site Allocations SPD is expected to identify land requirements.</p>
	(c.)	King Sturge LLP	<p>The policy reference to "...safeguarding suitably located existing employment sites..." is ambiguous, and further guidance is required on the definition of suitably located. Without this being defined there is the risk that the policy will be open to varying degrees of interpretation in the determination of planning applications, and will therefore be subject to varying degrees of success throughout the borough.</p> <p>Established parameters and guidance of what makes an employment site well located should either be included here or, if this is not possible, then cross-reference with a definition included at another part of the Core Strategy.</p> <p>Policy makes no reference to the potential to release some employment land for housing. This is required to ensure that the policy is compliant with PPS3, which states that Local Planning Authorities should consider whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development.</p>
	(d.)	Cranleigh Road Area Residents Association	Para.1 – question derivation of employment projections. What is their source?
	(d.)	East Guildford Residents Association	The basis of the figures for jobs needs to be validated. Where do the figures of 39,500 and 79,300 additional jobs by 2016 come from? What is Guildford's prospective share?

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	East Horsley Parish Council	In support of East Horsley as a District Centre, we need thriving retail shops and small businesses. Support reduced business rates for retail outlets in small communities and villages, particularly for 'traditional' or longstanding businesses which have become part of the fabric of the local community, to encourage these to remain active and prevent them being turned into charity shops and estate agents.
	(d.)	GBC	Reference is made to meeting GBC's provision through "new employment floor space as part of the Slyfield Area strategic development" amongst other things. However, there does not appear to be any provision to supporting and maintaining local infrastructure for pre-existing business areas. In particular I refer to the need for a review of the infrastructure around the existing Slyfield Industrial Estate which is struggling to cope with the usage it currently uses. This is also the case at other business/industrial parks across Guildford Borough.
	(d.)	Guildford Environmental Forum	Add: "The borough will be an exemplar of sustainable development to attract the best talent to support the knowledge economy". Add: "The retail offer will be adapted to meet the new paradigm of reducing consumption in line with the credit situation and the need to reduce our ecological footprint, which is one of the highest in the UK".
	(d.)	King Sturge LLP	An economic study of the borough is being prepared. It must be recognised that this policy may be subject to significant change in order to take the findings of this study into account. This may also be the case for the Employment Land Review which has not yet been completed.
	(d.)	Member of the public	Question whether adequate consideration been given to low level business development in or around small, rural railway stations. While these are often attractive they are also under-utilised and sometimes desolate. Perhaps small business or retail units either near or within stations should be considered and could support local communities. Guildford Borough Council should consult Network Rail as to possible opportunities.
	(d.)	SEERA	(c) and (d): How much employment floorspace/land may be required (including for waste management facilities), where and when and the need to set parameters for subsequent LDDs, also apply to this policy.
	(d.)	Send Parish Council	Within the London Fringe Sub-region there is a need to provide 39,500 additional jobs by 2016.' the Key diagram identifies 3 key employment sites - west of Guildford (University), 3 at Shalford and 1 at Slyfield. With reference to this need, there was a concern about where housing developments would be located to accommodate increases in population. It was considered more appropriate to locate these sites to the West and South of Guildford and not between Burpham and Clandon. This again was to protect the rural parishes affected.
	(d.)	Smiths Gore	Taylor Review of Rural Economy and Affordable Housing: Greater emphasis should be placed on the role of the Borough's rural area in supporting the local economy. Rural areas are in fact a major contributor to the national policy on a par with urban areas outside of London. Rewrite policy to explicitly support the location of employment generating uses within the urban area - including on sites within the Green Belt.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Terence O'Rourke on behalf of Wharf Land Investments (Jersey) Ltd.	CP3 establishes that no additional land will be allocated for employment use within the Western Corridor and Blackwater Valley Sub Region, a constrained scenario which the Core Strategy states may lead to surplus employment land being allocated in Guildford Borough Council's Site Allocations DPD. Policy CP3 must recognise that, given existing development constraints and the lack of suitability of all urban sites to satisfy business requirements, development in the Green Belt may need to be supported. Such recognition can be provided through the inclusion of specific wording in Policy CP3. The following wording should be inserted below the existing text, which states "Guildford Borough's provision will be met through": "Consideration of the potential for Green Belt sites to contribute to future economic growth, where land in the urban areas is unsuitable to satisfy business requirements."
	(d.)	Vail Williams	The councils preferred approach is to meet the sub-regional need for additional employment and 'inter alia' through new employment floor space as part of the SARP area. We request more information on the councils progress in relation to this project, which we note is missing from the background information to the core strategy and the relevant policies.
	(e.)	CGMS consulting	To allow re-use of unsuitable employment land for alternative uses it is recommended the policy includes the wording: "(the borough council will work with its partners and the community to) allow the loss of poorly located or unsuitable employment land and buildings to other uses, or assist the diversification of Guildford's rural economy".
	(e.)	Guildford & Waverley Friends of the Earth	Help to reduce the emissions of greenhouse gases from the business community and support its efforts to adapt to the consequences of climate change
	(e.)	Holy Trinity Amenity Group	Recognises the problem of empty Office Premises with the objective "promotion of vacant floor space and its adaptation to meet modern business, including communications, " but this could be further strengthened. Therefore - (a) Agree, but in recognition of possible further reduction in office space demand, e.g from shrinkage of the Financial Services sector, make insertion thus "Major office proposals will be considered if there is a proven demand, and will be located within Guildford urban area and in particular, within Guildford Town Centre.." It is important to avoid the speculative office development that has become a major problem.
	(e.)	Kingstons	How and why do GBC think they can and should dictate to the market what product is provided. How do GBC intend dictating what is an "appropriate type, size, price and quality"?
	(e.)	Kingstons	Directs employment development to sites where the location promotes the use of public transport. In effect that cuts out the whole of the Slyfield industrial estates and indeed most industrial locations. There should be a distinction between offices and warehousing/industrial. The policy states you will enhance and protect small to medium business but does not say how. It states GBC will ensure new floor space is adaptable but does not state how. Historically height restrictions imposed by the planners have reduced adaptability.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Vail Williams	<p>Too restrictive in that it currently limits the delivery of new employment land through either the SARP land or that in the site allocations DPD only "if required". It is our understanding that there is such a need for employment land in the borough we feel that there should be a stronger commitment to meeting employment needs in the policy wording, and therefore all references to additional land only being considered if required should be removed.</p> <p>There is no guarantee that allocated land will ever be brought forward and therefore there must be a policy mechanism that will allow for other suitable sites to be able to come forward to compensate. The whole purpose of the core strategy is to provide strategic policies that can respond to change over the 10 year period and by limiting the source of new employment land solely SARP and allocations, the boroughs ability to meet both need and demand will be compromised. To address the above points we suggest the policy wording is amended to:</p> <p>"Guildford Boroughs provision will be met through:</p> <ul style="list-style-type: none"> -Safeguarding suitably located existing employment sites for intensification, regeneration and/or expansion to meet future needs, including the appropriate growth of rural businesses, Promotion of vacant floor space and its adaptation to meet modern business, including communications, needs-new employment floor space to be provided through land suitable for employment development and strategic extensions to the slyfield industrial estate which are deliverable in the plan period".
CP4	(a.)	Aldi	<p>Acknowledge that Kingspost Local Centre is defined as such in the Core Strategy Consultation. Consider this recognition in accordance with the definition in PPS6. PPS6 confirms the characteristics of Local Centre and clearly show the acceptability of convenience retailing in such centres, including supermarket (main-food) facilities. In the wider context, such centres will form part of a hierarchy, with respective centres serving the needs of a specific catchment. This helps to encourage sustainable patterns of development, enhancing choice and minimising social exclusion. It is unclear how centres have been defined, although the types of uses in each should be taken into account. The absence of a supermarket in Kingspost may well have led to the centre not being considered as a District Centre. Nevertheless, the Core Strategy should be in accordance with PPS6 and these objectives, including to strengthen and enhance the offer of such centres. In this respect, clarification is necessary in terms of the definition of types of retail that the 2009 Core Strategy Consultation document suggests would and would not be acceptable. Policy suggests that convenience retail should be limited to "small scale", although stops short of defining what is meant. PPS6 clearly accepts that supermarkets are acceptable in Local Centres and this should be reflected in policy. Policy correctly identifies that local facilities are necessary in order to improve choice and minimise social exclusion. If supermarkets are not permitted in Local Centres and elsewhere where justification exists this will only lead to convenience trade continuing to leak from the centre, which will ultimately be to the long term detriment of the centre. Paragraph 9.25 highlights that neighbourhood shopping for convenience goods is important in terms of aiding those who have to travel by private car. This, by implication, is relevant to main food shopping, as clearly the majority of customers do not travel to top-up convenience shops (such as newsagents) by car. Therefore, the provision of a supermarket in scale with a local centre is entirely appropriate. Further, the presence of a supermarket in Kingspost will act as an anchor to the centre, helping to encourage linked trips to other shops and services in the centre.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>This will simply not happen if main food shoppers have no provision in Kingsport and are forced to shop elsewhere. Without this provision, main food shoppers will continue to shop elsewhere, thus prejudicing the long term vitality and viability of the centre. Paragraph 9.30 and the objective of increasing linked trips in local centres through enhanced convenience goods provision. Linked trips will simply not occur if the convenience offer is not of sufficient scale to clawback trade i.e. this attraction would not occur as a result of additional top-up destinations (i.e. newsagents, off-license etc). Linked trips will only be realised through an anchor foodstore, such as what Aldi will deliver.</p> <p>PPS6 is clear that the principal of extending a local centre is acceptable to meet a deficiency. The Green Man Public House is a historically established commercial premise that clearly functions as part of Kingspost local centre. Its continued use in this regard is therefore both logical and acceptable in planning terms. The Council are aware of Aldi's interest in this site and the offer of Aldi in particular will provide further benefits. In addition to creating an anchor store, Aldi will further compliment the local centre and existing shops and services, as people shopping will also have increased propensity to shop at those destinations (i.e. as Aldi does not stock, for example, newspapers and has limited branded goods etc).</p> <p>We also note policy CP5 and the requirement for infrastructure improvements and contributions as part of development, particularly to mitigate 'impacts'. Equally, the requirement for such contributions must have regard to the positive 'impacts' of development and benefits arising, along with other development constraints. Planning (and retail planning in particular) is a dynamic operation and should be facilitated through innovative development. In this context, PPS6 supports provision of enhanced choice and sustainable redevelopment. Extensions to centres to facilitate these benefits is further supported in PPS6 and the emerging draft. Our representations, for the reasons and justifications as outlined above, are that the Guildford Core Strategy supports these objectives, including specifically in respect of Kingspost Local Centre.</p>
(a.)		Barton Willmore	Support the continued identification of East Horsley as a District Centre. This recognises the wide range of shops; services; and facilities on offer in this centre and contributes to the overall sustainability of this settlement, above all other rural settlements in the Borough.
(a.)		CPRE Surrey Branch Guildford	In Surrey to protect and enhance the countryside depends on ensuring that the development of towns within the county is successful and appropriate. It is hard to evaluate what is proposed for the town centre when so much of its future development is still unknown. In addition to what is stated, reference should be made to how parking will be handled, and Park in Ride in particular. A commitment to ensure that the views from the High Street will not be harmed by development or the medieval street layout changed could be usefully added. It should be acknowledged that much of the design of post war retail development at Guildford has not enhanced the town's heritage or setting. The Debenham site alongside the river is a case in point.
(a.)		Downsedge Residents' Association	<p>(a) The text is generally acceptable, except that in the second paragraph it would be better to replace "directed to" with "encouraged to locate in" and to delete "in accordance with the following hierarchy".</p> <p>(a) Paragraph 9.22 will need rewriting if regional planning is abandoned. The emphasis on retail as key to the future of Guildford in both these paragraphs is risky if the behaviour of customers changes.</p> <p>(a) (e) In 9.25, third line replace "the Borough's retail hierarchy" with " Guildford Borough". In 9.26, delete heading "Centre for significant change". (d?) The list of centres in 9.26 includes "Epsom Road, Merrow". In addition to the shops in the main part of Merrow village there are a few shops and businesses at the bottom of High Path Road and Down Road. Should these be included separately?</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	DPP	<p>The policy states that retail development on unallocated sites outside of designated centres will not be supported unless:</p> <p>It is demonstrated that no suitably more sequentially preferable sites is deliverable;</p> <p>There is a demonstrable need; and the development is of a small scale to serve just the local convenience goods catchment area, it would not harm the vitality and viability of other retail centres; it would be located in an area where existing food store provision is poor (including small convenience shops in isolated petrol stations); and the retail floorspace associated with any garden centre is an ancillary nature; or the development is for a farm shop, where selling local produce would assist with diversification of the rural economy.</p> <p>Agree that proposals for out-of-centre retail development would need to demonstrate that there is a need for retail development, no suitably more sequentially preferable sites and that the development would not harm the vitality and viability of other retail centres.</p> <p>However, we disagree with the comment in the third bullet point in the above policy that out-of-centre retail development would not be supported, unless it is "of a small scale to serve just the local convenience goods catchment area", and consider this statement to be contrary to PPS6. If a proposal for out-of-centre retail development demonstrates there is a retail need for the proposal, the proposal would not harm existing centres, and that there are no sequentially preferable sites, we consider this to be sufficient to enable development in retail planning terms.</p> <p>Disagree with the following comment being included in the third bullet point above; "it would be located in an area where existing food store provision is poor (including small convenience shops in isolated petrol stations)". This statement refers to the qualitative need for retail development. However, the above policy already provides a requirement to demonstrate retail need (which covers both quantitative and qualitative need) We request that this statement is removed from the Policy.</p> <p>The third bullet point for Policy should read: "It would not harm the vitality and viability of other retail centres".</p>
	(a.)	Government Office for the South East	<ul style="list-style-type: none"> GOSE recommends inclusion of a distribution table summarising the broad geographical locations for future housing, economic growth including retail, and infrastructure including green space. Highlight strategic foci for development. Discussed other LPA examples.
	(a.)	Guildford Business Forum	The GBF Retail Group has responded on this policy.
	(a.)	Guildford Cathedral	We support this policy. The proposal to resist significant shopping development outside town centres should be strongly maintained. Maintain strong policies to prevent the loss of convenience shops in rural areas.
	(a.)	Guildford Society	<p>The historic character and attractive setting of Guildford's town centre is of such importance in underpinning the retail success of the town that protection and enhancement of these special qualities of the town centre should be made into a clear retail policy objective. Ensuring the High Street remains vibrant and at the centre of the retail offer, rather than marginalised and turned into a secondary centre by new developments, should also be a clear retail planning objective.</p> <p>More should be made of the value of district and local centres in creating a sense of community identity. If Guildford is to expand, nurturing a network of component communities will become increasingly important to retain the sense of belonging and community engagement from which the town has benefited so much to date. If the number of households increases on the scale proposed, positive steps need to be taken to prevent an increase in the social problems associated with the increased anonymity of larger towns.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Highways Agency	<p>Retail development also offers the opportunity to develop travel plans. Recommend that this is included within the policy or the supporting text to ensure that the impact of retail development is minimised. This is important in reducing the need travel by car that residential, employment and retail development all have a responsibility to do.</p> <p>Not supportive of development that is located outside the already designated areas.</p> <p>Supportive of the approach to seek contributions from retail and mixed use developers to meet infrastructure requirements. Expects demand to be minimised at source and will not support a strategy that will provide costly new infrastructure measures without first of all identifying and implementing alternative sustainable options in line with the objectives of PPG13. Where a number of development sites are proposed in close proximity to the SRN, advocate a joint working approach to provide a package of measures to manage demand and also provide as a last resort funding towards increased road space that will have a direct benefit in relieving pressure at specific points on the SRN.</p>
	(a.)	Holy Trinity Amenity Group	<p>Title is misleading. Suggest "Retail Provision".</p> <p>The statement "Additionally, small to medium scale convenience goods retail floorspace would be welcomed in the designed shopping frontage" is much too weak an action to tackle a major town centre problem. Further, large scale floorspace developments for convenience shopping should not be ruled out. A food supermarket would be of great value. The continuing loss of town centre convenience shopping forces local residents to drive out of town for their convenience shopping needs. The retail provision index given for Guildford is only 20 compared to the national average of 100. Without comprehensive convenience shopping facilities the whole basis for concentrating new housing close to the town centre is undermined – new residents will just use their cars to go out of town. Suggest replace the above phrase with "Positive action will be taken to restore provision of convenience shopping to the Town Centre".</p> <p>Disagree with the apparent proposition that the retail provision in Guildford is to be judged solely by the extent to which luxury retailers want to operate here, and the level of retail rents (higher the better). The latter is the main cause of the convenience shopping deficiency in the town. The primary test must be whether the retail provision meets the needs of present Guildford residents, and the increasing number who are about to become town centre dwellers on the assumption that convenience shopping is available.</p> <p>The objective to "strengthen its position in the regional hierarchy" suggests that Guildford should have a more dominant position in relation to its rivals; we disagree – the objective should be to maintain Guildford's retail status. We ask that this whole paragraph. be revised to recognise the above.</p> <p>Do not agree that the Friary development, if implemented, would "fulfil the ..convenience floor space needs to 2011". The extra floorspace would be completely inadequate to make good the current convenience floorspace deficiency. (It is understood that the proposed "basket" food store had in any case been deleted from the plans.) We ask that this statement be corrected.</p>
	(a.)	Member of the public	Re encouragement of smaller specialist shops, Butchers, Bakers and Green Grocers.
	(a.)	Shalford Parish Council	<p>references to encouraging the provision of local shops and resisting loss of existing units - especially the recognition of the importance of neighbourhood shops selling convenience goods (para. 9.25). Shalford is listed as a local retail centre (para. 9.26) but following the closure of the Total Garage, has no food/convenience store within walking distance and is concerned that the retail status of the garage site may be lost.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Solum Regeneration Partnership	<p>Object: Support the focus on the town centre uses as being suitable. Recommend inserting in the last line of paragraph 'Guildford Town Centre' "convenience goods retail floorspace would be welcomed in the designated shopping frontage and other town centre locations".</p> <p>Object to the absence of a policy supporting and enhancing tourism in Guildford. Consider specific reference should be made to encourage a range of hotel accommodation within the town centre which should be located in the most sustainable location. Land at Guildford station would be appropriate for hotel accommodation.</p>
	(a.)	Surrey County Council	<p>Para. 9.21 recognises there may be a need to ensure a variety of size and types of employment premises, including for uses such as waste management facilities, within existing designated industrial areas. This approach is welcomed and is consistent with SWP Policy WD2 which supports general waste development on land that has planning permission for industrial or storage purposes.</p> <p>Table 3.1 of the SWP contains a list of potential urban sites and industrial estates for accommodating waste management facilities and includes seven named sites within the Borough. A cross reference to the SWP would help clarify the situation.</p>
	(a.)	The Theatres Trust	<p>Strategic Objective MSG7 deals quite rightly with Guildford as being the preferred location for shopping, the policy only relates to the retail aspect of town centre uses and does not mention the other elements listed in MSG7 although this objective has been related to this policy. Suggest that the title of this policy is amended to either exclude town centre uses other than retail or the policy is expanded to include other town centre uses on a hierarchy basis otherwise MSG7 is not represented fully in the document. The area vision for Guildford town centre at item 5.2 on page 18 refers to the town centre's contribution to culture and the arts but this is not reflected in any policy.</p> <p>There will be an Area Action Plan for Guildford as the main centre in the Borough but there is no corresponding policy in the Core Strategy to which the AAP is connected. Guildford town centre should indeed be multi-purpose and succeed through a self-sustaining combination of working, living and leisure. Future leisure, arts and cultural facilities should be located within Guildford town centre and be part of a successful mixed-use environment with visiting audiences enlivening the surrounding area in the evening and providing regular custom for local bars and restaurants outside normal working and shopping hours to support an evening economy. We recommend a dedicated policy for Guildford which will provide the source for the AAP.</p>
	(a.)	University of Surrey	<p>Broadly support this policy which seeks to direct new development of retail / town centre uses to designated retail centres, dependent upon their scale and nature in accordance with the hierarchy. There may be instances where retail development outside of these locations maybe appropriate.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Waitrose	<p>We are fully committed to the Government's objectives of supporting town centres but consider that the approach in the Core Strategy does not reflect the sequential test approach in PPS6 which promotes "town centres first" whereas the Core Strategy approach appears to restrict new retail development to "the town centre only".</p> <p>The policy allows for out of centre development, subject to demonstrating it meets the retail tests in PPS6, para 9.28 assumes that all future retail need to 2011, can be met in Guildford Town Centre, either in the proposed extension to the Friary Centre or on other sites in the town centre, via the AAP, with out of centre retail sites being dismissed, as unsuitable locations for convenience retailing in para 9.30. This approach is not in line with the sequential test which supports town centres first but does not seek to protect the town centre at all costs, if that need cannot be met in the town centre.</p> <p>The Retail Study 2006 identifies convenience need and states that there is doubt over the deliverability of the Friary Centre extension. The Consultation Draft of the AAP 2006, only identifies two potential retail sites which could meet future retail needs. The Guildford Station site which is unlikely to be delivered within the foreseeable future, due to the high costs of rafting over the railway and the Guildford Car Park site but this is identified for housing, not retail. Waitrose has examined a number of other sites in the town centre but due to site constraints and ownership issues, has not identified any other suitable foodstore sites.</p> <p>If this is the case then the Core Strategy should be more flexibly worded to allow for the consideration of other locations, including out of centre sites, as otherwise it fails to meet future convenience retail requirements and deliver competition and choice to residents.</p>
	(a.)	Wanborough Parish Council	<p>In relation to retail development on unallocated sites, the Parish Council is worried that the list is too restrictive. Good retail development ideas in harmony with local surroundings should be encouraged rather than discouraged.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Wilmslow owners of the Friary shopping centre	<p>Generally supportive of the approach of this policy and particularly the encouragement of development and environmental & safety improvements that enhance the vitality and viability of the town centre, in order to maintain its position at the top of the regional shopping network.</p> <p>Friary site should be specifically acknowledged in the Core Strategy as the key retail site in Guildford which is essential for the delivery of the Councils retail strategy. In particular, we note that:</p> <ol style="list-style-type: none"> 1. It is the only site adjacent to the Primary Shopping Area which is capable of delivering a comprehensive retail scheme with a major anchor and therefore able to enhance the status of the town centre consistent with its defined role in the South East Plan. 2. It is under-utilised where environmental quality is less than satisfactory and policy should specifically acknowledge the Friary site as the principal location for the growth to occur the Borough. 3. Following the grant of planning permission for comprehensive proposals on the site and compulsory purchase and road closure orders it is a most of the land has been assembled and many other constraints addressed. 4. It is well located in relation to transport infrastructure. <p>The evidence base supporting the site already exists and, in addition to the Council's own retail study, includes the evidence presented by the Council for the Compulsory Purchase Order (CPO) inquiry. In deciding to compulsory purchase the land the Council were very supportive of the regeneration of the site.</p> <p>It is not evident that there have been any changes to these circumstances and new interest by a major anchor retailer re-affirms the need to ensure that the site is safeguarded and prioritised at the highest tier of the Council's planning policy as the principle retail development site in the town centre. PPS12 specifically recognises the importance of identifying strategic sites, this site is considered to fulfil this role. Deferring the site's identification to an AAP after the submission of the Core Strategy would result in uncertainty at precisely the time when certainty is essential to ensure that long term investment decisions can take place.</p> <p>An allocation of the site in the Core Strategy for comprehensive retail purposes should at this strategic stage remain high level and it would not be appropriate to identify a specific listcomplementary uses. Retail use should be prioritised. The owners wish to work with the Council to agree the best use of the site principally for retail purposes (A1-A5) having regard to the need to complement the operation of the existing town centre and make good use of other parts of the town. The Owners, wish to work closely with the Borough and County Councils to identify whether the town needs a large dedicated bus station which acts as a significant constraint on development and also a barrier to pedestrian permeability in the town centre as a whole.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(b.)	Waitrose	<p>In the absence of suitable town centre locations, allow large foodstores over 1000sqm, on out of centre sites which are accessible not only by car. Such sites could be effective, in terms of delivering future convenience shopping needs of the Borough, without undermining the role of Guildford as a regional shopping centre.</p> <p>Convenience shopping in Guildford, is primarily undertaken already at the large out of centre foodstores. Waitrose would like to offer a wider choice to residents as they are not currently represented in Guildford but need to compete with them to succeed; as a result it would need to offer comparable facilities. Waitrose believes that an out of centre site would not have any unacceptable impact on the town centre, as the main impact would be on these out of centre stores and thus would not significantly increase car trips.</p> <p>Guildford is identified as a regional shopping centre; the key role of such a centre is to provide a high order comparison shopping centre. The diversion of large foodstores away from the town centre would not undermine this role. It could have benefits for the town centre as well, as it would make the centre more accessible to shoppers and improve the attractiveness of shopping environment, by removing traffic from centre.</p> <p>In our view the Core Strategy is not flexible enough to deal with changing circumstances. The Council acknowledge that the Friary Centre Extension is in doubt but do not provide a satisfactory alternative strategy to handle this uncertainty, other than to state that “more certainty will be known at the end of 2009”. Waitrose believes that allowing foodstores in appropriate out of centre locations could address this issue.</p>
	(c.)	Guildford Society	<p>Policies to be replaced by the Core Strategy</p> <p>S2: Additional Retail Development in Guildford Town Centre. Replaced satisfactorily by CP4: Retail Hierarchy and Town Centre Uses.</p> <p>S8, S9 and S10: District and Local Shopping Centres and Neighbourhood Shops. Replaced in part and satisfactorily by CP4: Retail Hierarchy and Town Centre Uses. Restrictions on change of use clauses to be reviewed and replaced later.</p>
	(c.)	Peacock and Smith on behalf of Morrisons supermarkets	<p>The last paragraph, specifically bullet point 3, is not sound as it does not comply with government guidance PPS6. Respondent quoted bullet point 3 of CP4. PPS6 allows for out of centre retail development when the following 5 key tests can be demonstrated: 1.need, 2.appropriate scale; 3.no more central sites 4.no unacceptable impacts on existing centres, 5. accessible. We note from the councils retail study (2006) that there is significant capacity for additional convenience floorspace in the borough in the period to 2021.</p>
	(c.)	Waitrose	<p>Retail need is based on a Retail Study undertaken in 2006, which possibly underestimated the need then but it is now 3 years old. An updated assessment would assist in determining future convenience requirements to ensure that the Core Strategy addresses future requirements more accurately. This would be in line with PPS12 which requires the Core Strategy to be based on “robust and credible evidence”.</p> <p>Precludes out of centre retail parks as being a “suitable locations” for convenience retailing. This is contrary to PPS6 sequential test which states that such sites are acceptable, if there are no other existing town/edge of centre sites available. Therefore such sites may be the best alternative if there are no suitable sites in the town/edge of centre. It also conflicts with the policy which allows for out of centre locations, subject to meeting the retail tests.</p>
	(d.)	Member of the public	<p>134-page document is not suitable for public digestion. Para 9.28 on p42 seems particularly inept now that the Friary extension is not going ahead.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Member of the public	In relation to local centres, it is important that the policy concentrates on creating the conditions for a sustainable locality. This means paying attention to the mix of shops. It is vital to maintain conditions that will support maintenance of a good quality range of basic convenience shops in local centres.
	(d.)	Member of the public	The friary centre extension is abandoned. The 25,000m2 of additional retail space can be seen to be absurd when we see the towns established retailers struggling to survive. With support most will get through the downturn.
	(d.)	SEERA	(c) and (d): how much floorspace for town centre uses is intended to happen, where and when and the need to set parameters for Guildford Town Centre Area Action Plan, also apply to this policy.
	(d.)	Waitrose	No.
	(e.)	CGMS consulting	The inclusion of the wording 'it would be located in areas where existing food provision is poor' is unnecessary as the policy already requires out of centre development to display a 'need' for the floorspace. If an area already has a provision of convenience goods floorspace, it does not necessarily follow that it could not support further provision. It is therefore recommended this wording be removed from the policy. The text of policy does not accord with national policy as new retail floorspace in a local centre should be of a scale to compliment the 'role and function' of the local centre in PPS6 terms, not the 'scale of existing premises in the centre'. It is therefore recommended the wording of the policy be amended to read "new retail floorspace will be limited to small scale development in keeping with the role and function of the centre and which serves everyday local needs"
	(e.)	Jencar Engineering	Page 45 Redhill does not have a hyphen in the middle.
	(e.)	Member of the public	Object - para 9.25 et seq Fail to comprehend the importance of semi-out-of-town retailing to Guildford, which is dismissed in para 9.30. Ladymead and the Tesco and Sainsbury Supermarkets, together with the retail and semi-retail facilities along and alongside Woodbridge Road and Walnut Tree Close provide a considerable part of Guildford's retailing.
	(e.)	Waitrose	<ul style="list-style-type: none"> • <input type="checkbox"/> Para 9.27 should be amended to include a commitment to update the Retail Study 2006 <input type="checkbox"/> • <input type="checkbox"/> Para 9.28 the last sentence should be deleted and replaced with "A sequential approach to site allocation will be undertaken to meet future retail needs." <input type="checkbox"/> • <input type="checkbox"/> Para 9.30 delete and replace with "Out of centre sites/retail parks may be appropriate to meet future retail need, in the absence of a suitable alternative town/edge of town sites." <input type="checkbox"/> • <input type="checkbox"/> Policy CP4 should be redrafted following an up to date assessment of future retail requirement and a full assessment of the sequential approach so that locations are identified which are deliverable and can meet future retail requirements.
CP5	(a.)	Carter Planning Limited	No
	(a.)	CPRE Surrey Branch Guildford	Generally support this policy. However, are uneasy about how the infrastructure deficit will be resolved at Guildford and the provision of extra infrastructure provided in terms of schools given the major population increase envisaged. Wonder whether the AirTrack proposal will ever happen, particularly in view of the level crossing problem in Runnymede. We note that there is no reference to improvement of the North Downs rail link to Gatwick. We welcome the recognition that the Green Infrastructure described in Policy CC8 of the SE plan should be a priority for Guildford.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Cranleigh Road Area Residents Association	<p>Policy statement weak, given no definition of infrastructure other than reference to the Infrastructure SPD which covers specific implementations rather than general principles. Should include at least the definition of infrastructure included in para.</p> <p>The draft SE Plan and the draft Core Strategy are both significantly 'infrastructure lite', and whilst there are policies at both levels stating that development must be accompanied by corresponding infrastructure, the definition of "infrastructure" is unclear. There is a dissonance between the hard, quantified targets of the housing policy and the vagueness of the infrastructure policy.</p>
	(a.)	Downsedge Residents' Association	<p>Paragraphs in box (a) - This is a very important policy and we should be unhappy if it were watered down.</p> <p>Paragraphs 9.33-9.42 (a) These also are important paragraphs, especially the 'unpacking' of the term "infrastructure" in 9.34, where there should also be specific mention of additional Park and Ride sites and improvements to the road network. These paragraphs (d) could be strengthened by recognition that there is a massive infrastructure deficit in Guildford Borough and surrounding areas due to lack of investment over the years. Paragraph 9.38 (e) need some revision if regional planning is abandoned.</p>
	(a.)	East Guildford Residents Association	<p>This policy is fully supported. It is vital that GBC insists on infrastructure before development.</p> <p>View expressed by senior SCC and Highways Agency representatives was that the prospective financial provision by Government for the transport needs of Guildford and the A3 was a woefully inadequate £70m, enough only to do no more than minor works.</p> <p>GBC needs to resist any development if it is not supported by adequate infrastructure.</p>
	(a.)	East Guildford Residents Association	<p>It is vital that Infrastructure is in place or firmly committed when significant development is contemplated. Some examples of helpful comments in the consultation are:</p> <ul style="list-style-type: none"> • Policy CP5 page 45 – states 'Infrastructure needed to support the delivery, and mitigate the impacts, of developments must be in place or be committed to be provided within a suitable timeframe.' • Para 9.38 page 46 states 'an Infrastructure Requirements and Delivery Study is being prepared that will provide details of the physical, social and green infrastructure required at local level to deliver the growth anticipated in this spatial strategy.' Important to ensure that this study is done by GBC
	(a.)	English Heritage	<p>Highlighted text under para. 9.42 draws upon the draft South East Plan (July 2008). Policy CC8 is referred to with its reference to maintaining and improving biodiversity. The Core Strategy should also refer to the need to deliver recreational and cultural benefit at this point.</p>
	(a.)	Government Office for the South East	<ul style="list-style-type: none"> • Opportunity to strengthen plans for the rural economy. • Recommends inclusion of a distribution table summarising the broad geographical locations for future housing, economic growth including retail, and infrastructure including green space. Highlight strategic foci for development. • More detail recommended on infrastructure. Suggest state what is needed for each area, including for strategic sites and what will be expected from S106 for each area.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Business Forum	GBF support this policy which seeks to ensure the delivery and maintenance of essential infrastructure. Standard charges and formulae are welcomed. To increase transparency further, clear accountability should be established of how, when and where financial contributions from all developments are spent. Funds unspent within 5 years of receipt by the Council should be refunded to the payer. GBF is supportive of the Council's objective to continue to work with infrastructure providers to identify needs and to plan for the local infrastructure required to support the anticipated level of housing and economic growth. However more needs to be done.
	(a.)	Guildford Cathedral	The dean and chapter support this policy. Ensuring the delivery and maintenance of essential infrastructure is fundamental to the well being of the borough, both today and in the future.
	(a.)	Guildford Society	Paragraph 9.38 A paragraph and explicit policy reference should be dedicated to provision of new green infrastructure.
	(a.)	Highways Agency	The HA is supportive of the approach taken within this policy. The HA recommends that travel plans are included within planning conditions and are specifically noted within this policy Also recommend that funding sources are identified at the earliest opportunity. Paragraph 9.33 -The HA believes that consideration should also be given to the cumulative impact of small and medium sized developments. The HA also supports the use of a standard charges formula to ensure that small and medium developments also contribute towards infrastructure funding as noted in paragraph 9.35. Where the infrastructure requirements and capacity study are noted within paragraph 9.42, the HA would wish to be involved in any consultation on these documents.
	(a.)	Home Builders Federation	HBF strongly objects to this paragraph since there can be no control over what might never happen. Thus the Council's policy would be contrary to the provisions of Circular 5/2005 regarding planning obligations. The correct process is not to require pro rata planning obligations it is to refuse planning permission as the Council see the partial development of the site as not proper planning for the area.
	(a.)	Natural England	Pleased that policies refer to green infrastructure. Support the use of pooled developer contributions to fund this. The Infrastructure SPD, should set out how Guildford Borough Council will plan, provide, and manage networks of accessible multifunctional greenspace, as stated in the South East Plan policy CC8. Developer contributions, the Community Infrastructure Levy and public sector funding will help to deliver Green Infrastructure. Appendix supplied for Natural England's green infrastructure policy. ANGST standards could be used as a target and indicator to ensure adequate green infrastructure green infrastructure provision. Advised to refer to the South East Green Infrastructure Framework.
	(a.)	Ockham Parish Council	Supports the infrastructure policy, especially first paragraph.
	(a.)	RSPB	All infrastructure needed to support the delivery, and mitigate the impacts, of developments must be in place and functionally operational before developments are occupied.
	(a.)	Shalford Parish Council	recognition of importance of adequate infrastructure provision to underpin development
	(a.)	Solum Regeneration Partnership	Object - We consider the policy should be reworded to state "planning contributions should be sought unless applicants can make an exception on viability grounds".

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Sport England	<p>Supports the principle of Policy CP 5 and welcomes the inclusion of sports facilities within the supporting text (paragraph 9.34).</p> <p>The development of the Infrastructure SPD (adopted 2006) does not appear to cover a wider range of sporting provision including built indoor facilities. Any new development, especially residential, will generate demands for a range of formal sporting provision including both outdoor and indoor provision.</p> <p>It is assumed that the inclusion of 'sports facilities' within paragraph 9.34 covers the range of sporting provision that may be required to meet the needs arising from development and is not limited to open space and playing field land. Sport England would therefore expect the Infrastructure Requirements and Delivery Study, any revision of the SPD, along with the Town Centre AAP and Slyfield Regeneration Area master plan to address these wider needs for sporting provision.</p> <p>Sport England has developed an online Planning Contributions Kitbag</p>
	(a.)	Surrey County Council	<p>There is a requirement for developer contributions. Would SUPPORT a policy that would facilitate expansion of educational infrastructure to meet increased demand from new housing. We would fully support a policy of pursuing S.106 contributions from developers, and would also support the implementation of a local levy or tariff scheme, based on a Surrey-wide framework, with flexibility to address local circumstances</p>
	(a.)	Surrey County Council	<p>Para. 9.34 recognises that infrastructure includes waste recycling facilities. More attention needs to be given to the management of commercial and industrial wastes in conjunction with the business sector and the county council as waste planning authority.</p> <p>Para. 9.41 mentions that the Slyfield Area Regeneration Project will provide new waste management facilities and is welcomed, but a cross-reference to Policy WD2 of the Surrey Waste Plan is desirable.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Thames Water	<p>Referenced: Paragraph 4.8 of the new PPS12, June 2008. Paragraph 4.10 of PPS12. Paragraphs 10.8 - 10.12 of RPG9, March 2001 & Part 9 the Revised Draft South East Plan, July 2008</p> <p>The Core Strategy must make specific reference to the provision of water and sewerage infrastructure to service development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure forms and integral part of the sustainability appraisal.</p> <p>To meet the test of “soundness” as set out in PPS 12 it is essential that the LDF does clearly consider such water and sewerage infrastructure.</p> <p>The water companies’ investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. Currently in the AMP4 period which runs from 1st April 2005 to 31st March 2010 and does not therefore cover the whole LDF period. AMP5 will cover the period from 1st April 2010 to 31st March 2015 and we have submitted our business plan to OFWAT for approval by the end of 2009. As part of our five year business plan review Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements can not be required to secure water and waste water infrastructure upgrades.</p> <p>It is be essential that the Core Strategy makes reference to the provision of adequate water and sewerage infrastructure to service development to avoid unacceptable impacts on the environment (such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems). Therefore, if the Core Strategy is to meet the “soundness” test, then it should include the following policies and sub-text:</p> <p>“PROPOSED POLICY - WATER AND SEWERAGE INFRASTRUCTURE CAPACITY:</p> <p>Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:</p> <ol style="list-style-type: none"> 1.sufficient capacity already exists or 2.extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. <p>When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development.”</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>Text along the following lines should be added to the Core Strategy to support the above proposed Policy :</p> <p>“PROPOSED NEW POLICY SUPPORTING TEXT - The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.”</p> <p>Furthermore, PPS12 requires that in preparing Local Development Documents, authorities should consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them and the environmental effects of such additional uses.</p> <p>Hence, a further policy should be included in the LDF Core Strategy as follows: “PROPOSED NEW POLICY – Utilities Development: The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</p>
	(a.)	The Clandon Society	The infrastructure in GBC is bad even before any further development.
	(a.)	The Theatres Trust	Support a policy to show an overall approach to developer contributions which should also contain appropriate references to strategic sites and clear links to the details set out in the forthcoming supplementary planning document.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	University of Surrey	<p>Supports this policy that seeks to ensure the delivery and maintenance of essential infrastructure. This is fundamental to the well being of the Borough. Standard charges and formulae are welcomed. To increase transparency further, clear accountability should be established of how, when and where financial contributions from small developments are spent. Supportive of the Council's objective to continue to work with infrastructure providers to identify needs and to plan for the local infrastructure required to support the anticipated level of housing and economic growth. However it would stress that more needs to be done. In line with government policy the University has increased its student numbers and provided more local community access to its facilities to improve town and gown relationships. Has also built over 2500 residences in the same period and □ has plans to build more. Concerns that infrastructure provision in the vicinity of the University is totally inadequate to service its needs. Recent development and expansion by neighbouring users in the area has not been matched by investment in the delivery of associated infrastructure improvements. This has resulted in a significant increase in congestion within the local road network.</p> <p>The University has had a rigorous travel plan in operation since 1994, enhanced in 2004, to limit their impact on the network. Concerned future growth and management of the University and the Research Park may be constrained by the existing transport infrastructure, should investment in the short term not be forthcoming. The University is taking a lead in developing plans for the infrastructure in the absence of any significant effort by the public authorities. The Core Strategy needs to say more about addressing existing infrastructure deficits, particularly in road infrastructure, and the role of public funding in solving existing problems so that these do not continue to be a frustration and a barrier to the effective functioning of important institutions, businesses and local communities.</p>
	(a.)	Vail Williams	<p>Infrastructure Development Plan Document (DPD) should replace the Supplementary Planning Document. Should take account of the pressure on the Royal Surrey County Hospital to invest considerable capital in the estate to cater for the continued growth of the town. The Infrastructure DPD should seek contributions from developments towards the hospital's services, provision and improvements. Contributions should not be sought from developments at the Royal Surrey County Hospital.</p>
	(a.)	Wanborough Parish Council	<p>Concentrates on the areas under the control of GBC who have little or no control over the roads, both major and minor, within the Borough and yet these would form the basis of any strategy of the area. Strategies relating to access and movement would place an increased strain on the Borough roads. (Also relevant for CP4, CP6 and CP10).</p>
	(a.)	Westborough, Broadacres & District Residents Association	<p>Policy needed now. The statement about "local infrastructure required to support the anticipated level of housing" is a nonsense. It hasn't happened yet so why should it happen in the future? Roads and Drainage Service are in a bad condition, traffic jams & congestion are routine daily problems.</p>
	(a.)	Woolf Bond Planning on behalf Martin Grant Homes Ltd	<ul style="list-style-type: none"> • We agree with the provisions of the first paragraph of Policy (PS, that the infrastructure needed to support the delivery and mitigate against the impacts of development must be in place or be committed to be provided within a suitable timeframe. • We object to this strategy and consider development tax to be unjustified. Instead, the contributions provided for infrastructure in relation to new development should be specific to the particular site under consideration. • It is considered that the provisions of Policy (PS should be amended to reflect the comments set out above.
	(b.)	Carter Planning Limited	No

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(c.)	Carter Planning Limited	The Proposed Policy does not reflect the advice in Circular 05/2005.
	(d.)	Burpham Community Association.	Development should be minimized until infrastructure can be confirmed. It reads too much like - if a business wants to be located in Guildford and can pay for it then it will happen. What is the area the businesses will have to consider for infrastructure.
	(d.)	Carter Planning Limited	Development seems to be viewed as a panacea to rectify existing infrastructure deficiencies and to provide future infrastructure. This is not permissible under the provisions of Circular 05/2005. The provision of infrastructure related to development must arise from the needs of that development and specifically not be a tax or standard charge and should not be used to remedy existing deficiencies.
	(d.)	Crownhall Estates	No mention of the fact that people want to know that if a development takes place in say Ash the tariff will be spent in Ash. This makes the system accountable and transparent. Moreover there should be a 'use it or lose it' principle embodied which ensures the public sector custodian have an imperative to use the capital within 3 years or the tariff is returned to the applicant.
	(d.)	East Horsley Parish Council	Prefer the first alternative option at 9.42 as it offers a more practical solution to infrastructure needs for outlying areas such as East Horsley. This policy needs much greater weight so that adequate infrastructure in place becomes a prerequisite before any major housing expansion is permitted in the future. Expansion of housing capacity unmatched by corresponding increases in infrastructure capacity will be unsustainable.
	(d.)	Environment Agency	Policy CP5 provides a broad view of potential improvements which can be sought from development. We welcome the use of both planning conditions and developer contributions to provide the required infrastructure. Welcomes the inclusion of Green Corridors and flood defences and hopes a supplementary planning document will be provided. The glossary should include a definition of green infrastructure, as the Core Strategy indicates this is relating to open space. Land Contamination - The current Infrastructure SPD includes land contamination, which is not featured in the Core Strategy. May be best to have a statement to the effect of "For land contamination and pollution prevention/control, the council will apply PPS23." Phasing - The Phasing of developments is important when considering the timing of studies to inform infrastructure provision. We would expect the information to be provided prior to the grant of outline consent, to show that it is both feasible and acceptable to provide the required infrastructure for the subsequent phases of development. This will allow for an integrated approach to infrastructure provision in phased developments. SUDS - Highlighted in the South East Plan policy NRM4 (previously NRM3). However, this may fit better with the Flood Risk Policy (CP22) or Sustainable Development and Construction Policy (CP20). Flood Risk - Should there be a link to the Risk Reduction Measures document and approach be mentioned here, with a reference to CP22

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Guildford Business Forum	<p>GBF's concern is that future growth to the west of the town centre may be constrained by the existing road provision, should investment in the short term not be forthcoming.</p> <p>In the villages and other rural parts of the borough ditches and culverts form a major part of the drainage infrastructure of the borough and it is important that these are protected and maintained to prevent flooding. In areas where flooding currently occurs or has occurred developers should be required to carry out and submit detailed topographical/drainage studies and proposals.</p> <p>The Core Strategy needs to say more about addressing existing infrastructure deficits, particularly in road infrastructure and land drainage, and the role of public funding in solving existing problems so that these do not continue to be a frustration and a barrier to the effective functioning of important institutions, businesses and local communities.</p>
	(d.)	Guildford Environmental Forum	<p>Para 9.40 – 9.56: Traffic speeds in residential areas need to be restricted for safety, noise pollution control, to encourage young and old cyclists to return to the roads, and for pedestrians. Road damage (potholes) is an issue with the public as is the high cost of road maintenance. A new bullet is suggested: "A new courtesy relationship between motorised transport, pedestrians and cyclists will be introduced using the shared space concept for roads, particularly in residential areas". Secondly, "To reduce ever growing traffic noise a 50 mph speed limit will be rigorously imposed on the A3 and other A roads near residential areas".</p>
	(d.)	Guildford Environmental Forum	<p>New bullet point suggested: "Integrated low carbon energy provision based on district heating and cooling will provide efficiencies and resilience against increasing dependence on imported fuel".</p>
	(d.)	Guildford Society	<p>No mention of transport infrastructure. Add to the end of the last para.: "and to improve the transport network to reduce journey times".</p>
	(d.)	Home Builders Federation	<p>Current confusion by the Council between the current regime of the tests for necessity and the methodology of CIL. The policy itself needs to make a reference to the fact (recognised in paragraph 9.37) that any such negotiations should take account of viability of development and that the Council's requirements should not render sites unviable. It should be acknowledged that, in some cases, the benefit of the development may outweigh the requirement for developer contributions and that alternative funding for infrastructure will be sought.</p>
	(d.)	SEERA	<p>This section and eventual supporting text should refer to the recently endorsed Thames Basin Heaths Delivery Framework and the need for the provision of SANG and the collection of contributions for the provision of access management measures on a strategic (cross authority) basis. A cross reference to Policy 26 would be helpful. Paragraph 9.34 could usefully refer to the definitions of infrastructure and green infrastructure assets set out within the Proposed Changes to the South East Plan; Box CC2 and Box CC3.</p>
	(d.)	Surrey County Council	<p>Page 45 at the end of the first sentence of the boxed policy text, the words ".....within a suitable timeframe." are rather vague. Suggest replacement with words similar to the South East Plan Policy CC7 "..... within a timeframe aligned to mitigate impacts and the needs of the development".</p> <p>Within the references in the boxed text on page 45 and within para. 9.35 on page 46 about standard formulaic (transport) infrastructure charges, we should suggest appropriate reference is made to the County's adopted Planning Infrastructure Charge (PIL), or to the forthcoming Community Infrastructure Levy (CIL).</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Terence O'Rourke on behalf of Wharf Land Investments (Jersey) Ltd.	Referenced Paragraph 34. The Infrastructure requirements arising from Guildford's continued growth is likely to have significant land use implications, particularly where key public service infrastructure relating to criminal justice, education and social services needs to be expanded. Accommodating the needs of infrastructure expansion around Guildford may require provision of a large site, of the type unavailable within Guildford's urban core. Policy CP5, relating to infrastructure provision, must acknowledge this to ensure future delivery of Core Strategy objectives is not compromised. Policy CP5 should have the following text inserted: "The significant infrastructure requirements arising from Guildford's growth may require development on large, suitable, sites within the Green Belt. Such development will be supported where very special circumstances exist."
	(d.)	Vail Williams	Policy refers to the Infrastructure Supplementary Planning Document. A Development Plan Document be more appropriate as it would be fully tested and transparent.
	(e.)	Carter Planning Limited	Reference should be made to the provisions of Circular 05/2005.
	(e.)	Guildford & Waverley Friends of the Earth	Infrastructure needed to support the delivery, reduce the impacts, of developments and mitigate the impacts of climate change must be in place or be committed to be provided within a suitable timeframe. 9.34 Provision may be required for a range of infrastructure needs arising from all types of development.
	(e.)	Guildford Environmental Forum	9.34: Suggest including " , land adjacent to settlements to grow food,". □ 9.40: Suggest: "Demand management will be considered, particularly for transport, water and waste infrastructure". Large water supply infrastructure investment will be needed before 2026 so collaboration with Thames Water to reduce the cost to customers is logical.
	(e.)	Guildford Society	Policies to be replaced by the Core Strategy G1(2): Replaced by CP5 Infrastructure which covers all infrastructure and states "Infrastructure... must be in place or committed within a suitable time frame." The words "within a suitable time frame" should be strengthened as much as permissible within government policy. It states that developers will contribute to additional infrastructure. Standard charges and formulae are to be set out in the Infrastructure SPD – but were not find in the current version (September 2006). Text leaves matters unclear. G6: Replaced by CP5, which is more thorough and refers to the Infrastructure SPD,
	(e.)	Holy Trinity Amenity Group	We ask that in the last sentence, listing infrastructure requirements, the phrase "open space improvements" is reworded as "open space provision". By the continuing practice of converting the provision of extra open space for new developments to "improvements" to existing open space – which does not meet the requirements of government or local planning policies.
	(e.)	Home Builders Federation	The recognition that infrastructure providers have an obligation to assess and address the needs of new development and growth within the Borough in order that they can plan their investment in new infrastructure more efficiently and in a timely manner should be made more explicit in the policy. At the very least the second sentence of the policy should be amended to include the words "existing or planned capacity". The final paragraph should be elevated to become the most important paragraph in the policy.
	(e.)	Surrey County Council	Para. 9.34. Replacement of "education premises" as it is too narrowly defined. Replace it with "educational facilities" as capital may be used for the rooms. Would like Early Years facilities to be included under educational infrastructure and post-16 education to be included within the educational infrastructure.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	The Planning Bureau Ltd.	Acknowledged existence of the Infrastructure SPD. Policy should be consistent with national guidance and make reference to Circular 05/05 and the tests set out in paragraph B5.
CP6	(a.)	CEMEX	Supports the principles of integrating development and transport provision by directing development to locations that are accessible to key services and facilities
	(a.)	CPRE Surrey Branch Guildford	Support the policy. Would object strongly if a greenfield site is chosen for Park & Ride before all brownfield alternatives have been fully considered.
	(a.)	Cranleigh Road Area Residents Association	The Vehicle Parking Standards SPD is unrealistic. Even if reduced car use is achieved, this does not necessarily mean reduced car ownership. On-street parking is detrimental to the street scene and conflicts with other policies concerning townscape and character.
	(a.)	Downsedge Residents' Association	Paragraphs in box. First bullet point (e) Replace “directing” with “encouraging”. (a) Third bullet point. The Vehicle Parking Standards SPD badly needs revision as it has led to unacceptable levels of parking in residential roads. There is no mention of measures to mitigate the increase in home deliveries likely to be generated by Internet shopping.□ Paragraph 9.43 (d) Add at the end of the second sentence “as does the hilly topography of Guildford”. Paragraph 9.44 (d) Suggest prefixing this sentence with something on the following lines: “It is recognised that car ownership gives individuals a freedom of movement that they value. Nevertheless reducing.....” Paragraph 9.45 (a) Acceptable. Paragraphs 9.46 and 9.47 (a) These are not acceptable as written. Congestion and pollution are caused by car use, which is related to parking for employment and shopping. Motorists will tend to find places to park in residential roads. Park and Ride is a good way of mitigating the need for this type of parking. Paragraph 9.48 (a) Recent transport assessments in the Downsedge area run contrary to the experience of local residents. Suggest adding (d) wording on the following lines: “In the preparation of traffic assessments and transport statements regard should be had of the experience of those who live or work in the vicinity of the development site.”
	(a.)	Drivers Jonas on behalf of CEMEX	In relation to proposed Policy CP6 CEMEX supports the principle of integrating development and transport provision by directing development to locations that are accessible to key services and facilities.
	(a.)	Government Office for the South East	Opportunity to strengthen plans for the rural economy.
	(a.)	Guildford Business Forum	Supports this policy, and the Council's position of facilitating a transport and movement system that reduces the need to travel by car and improves accessibility.
	(a.)	Guildford Cathedral	The dean and chapter support this policy, and the councils position of facilitating a transport and movement system that reduces the need to travel by car and improves accessibility. Maximum parking standards only like to work in town centre area and not in rest of borough.
	(a.)	Guildford Constituency Labour Party	Generally support, but delete “where practicable” from the last bullet point on assisting access via public transport, walking and cycling. This wording is a standard clause enabling developers to wriggle out of the policy.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Society	Do not support continuation of these policies which have failed and resulted in pressure for on-street parking. This plan should ensure sensitively designed, sensible provision of car parking spaces and far greater consideration should be given to planning for more environmentally friendly vehicles such as electric cars. Dedicated cycle paths are also required on key routes.
	(a.)	Highways Agency	Supportive of the approach taken in this policy with reducing the need to travel. Where the use of parking standards has been noted, the HA recommends that these are used a maximum and in conjunction with other demand management measures to manage down the impact of development. Parking measures along with others noted in this policy can all be incorporated in to travel plans.
	(a.)	Ockham Parish Council	Support this policy.
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	It is claimed within this policy that development and transport provision will be integrated, a use of mixes should be encouraged and that the majority of all future development is well related to existing or future public transport. Agree in principle with this Policy, but the strategy will do little to assist in allowing for a number of development proposals which would otherwise conform with the Policy. The alternative options of allowing for sustainable urban extensions which would have been compatible with the policy do not even seem to have been considered let alone rejected. Fails to meet the needs of the local economy and housing needs. Alternative development scenarios such as a sustainable mixed-use urban extension to the south of Guildford town has not been considered. Changes need to be made.
	(a.)	SEEDA	Welcomes these policies which complement RES target 8 to 'reduce road congestion and pollution levels by improving travel choice, promoting public transport, managing demand and facilitating modal shifts'.
	(a.)	SEERA	Welcome these policies which include measures to manage travel demand and encourage the use of more sustainable forms of transport and the location of development close to services and recognise the need to work in partnership with the Highway Authority, Surrey County Council, and the links with the LTP. The supporting text could also usefully explain how the policies will support the role of the regional spokes that relate to the borough.
	(a.)	Solum Regeneration Partnership	Supports locating developments accessible by a range of transport modes. Object to the parking reference policy and consider the words "in relation" should be replaced by "having regard" to allow the policy to be applied more flexibly.
	(a.)	University of Surrey	Supports this policy, and the Council's position of facilitating a transport and movement system that reduces the need to travel by car and improves accessibility. Suggests that rigid adherence to maximum parking standards for housing, irrespective of location, is unlikely to lead to successful developments. It is only likely to be in Guildford Town Centre that such a policy will be successful.
	(a.)	Vail Williams	Supports the promotion of means of travel other than private car. The Trust is actively reviewing how travel can be promoted by alternative means. The strict application of car parking standards towards visitor and patient trips is not appropriate. The Hospital is a major community facility supplying a vital service whereby visitors and patients (some of whom are day surgery cases) should not suffer from lack of adequate parking facilities as a result to overly prescriptive parking standards.
	(a.)	Wanborough Parish Council	Para 9.46 - It cannot be desirable to use parking as a 'tool' for influencing car-borne travel as surely it would be better to provide alternatives ie encouragement rather than punishment.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Woolf Bond Planning on behalf Martin Grant Homes Ltd	<ul style="list-style-type: none"> • The respondent listed the objectives of policy CP6 • We support the integration of public transport with new developments, as well as the provision for encouraging a mix of land uses, in reducing the need to travel and improving accessibility, as set out in Policy CP6.
	(a.)	Worplesdon Parish Council	Strongly object to any green field sites being used to construct Park & Ride sites. Brownfield sites suggested.
	(b.)	East Horsley Parish Council	Prefer the alternative solution #1 at 9.48 as it gives greater appreciation to the reality as regards the limitations of public transport facilities in outlying areas such as East Horsley.
	(b.)	Guildford Environmental Forum	Plentiful car parking provided at rail stations can increase car use. Should be a priority to facilitate walking and cycling to rail stations. Commuters that get dropped and collected at the station generate double car journeys . The Premium car parking outside Guildford station is ended and the space used for bus services linking to rail services and the priority road space needed for bus lanes accessing the station. Again a premium on car parking hypothecated to these kind of improvements is suggested.
	(b.)	Member of the public	Guildford suffers from over-parking of cars in residential streets. Parking restrictions in town centres and at destinations are a means of controlling the use of cars. Steps must be taken to prevent overspill into residential roads and into parking facilities for other purposes. New housing should provide sufficient parking spaces to prevent unsightly and difficult car parking in residential roads.
	(d.)	Guildford Business Forum	Rigid adherence to maximum parking standards for housing, irrespective of location, is unlikely to lead to successful developments. Insufficient on site parking provision on new housing developments pushes the additional vehicles on to adjoining public roads. It is only likely to be in Guildford Town Centre that such a policy will be successful.
	(d.)	Guildford Environmental Forum	Para 9.40 – 9.56: Traffic speeds in residential areas need to be restricted for safety, noise pollution control, to encourage young and old cyclists to return to the roads, and for pedestrians. Road damage (potholes) is an issue with the public as is the high cost of road maintenance. A new bullet is suggested: “A new courtesy relationship between motorised transport, pedestrians and cyclists will be introduced using the shared space concept for roads, particularly in residential areas”. Secondly, “To reduce ever growing traffic noise a 50 mph speed limit will be rigorously imposed on the A3 and other A roads near residential areas”.
	(d.)	Guildford Society	<p>Welcome the rejection of congestion charging. It is inconsistent to say “reduce car-borne trips by”, then referring to new developments.</p> <p>The point is made in background data that 56% of car journeys are of 5 miles or less. This uses engines at least efficiency and hence at maximum CO2 output. Cycle parking is only mentioned in CP7.</p> <p>Amend the end of the sentence to read: by minimising car-borne trips, especially over short distances.</p> <p>Insert - Applying minimum cycle parking standards to ensure that new development provides adequate provision for cycling.</p>
	(d.)	Highways Agency	Paragraph 9.48 - Circular 02/2007 and PPG13 should be included in this paragraph. Remove the “and / or” before travel plans and replacing this with “and travel plans” to ensure that they are required in addition to the transport assessment or statement. To give guidance to developers, there should also be additional text outlining what will be required from a travel plan.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Holy Trinity Amenity Group	<p>Additions to policy: "The adoption of pedestrian and cycle routes by the Highways Authority will be treated with the same importance as that given to vehicle routes, and developers will be required to meet the standards required by the Highways Authority for adoption of such pedestrian and cycle paths". Without this pedestrian and cycle routes are not properly maintained, and sometimes not even provided although they were part of the development plans.</p> <p>Para 9.46 and 9.47, Parking provision - It is not clear whether these paragraphs refer to residential parking or parking for other developments. Strongly oppose restrictions to onsite parking for new residential developments. It does lead to an increase in the serious on-street parking problems. Support restricted parking at destinations of journeys from home. Section should be reworded to place the emphasis on restriction of non-residential parking.</p>
	(d.)	Member of the public	<p>Consider overnight use of all Park & Ride facilities for Camper vans. Would encourage more tourism and go some way toward solving the lack of Camping Grounds.</p>
	(d.)	Send Parish Council	<p>No mention of improving the Guildford Bypass.</p>
	(d.)	Surrey County Council	<p>Policies CP6 –CP8 consistent with the County Council's approach to transport as set out in the second Local Transport Plan and can therefore be SUPPORTED. They also appear to reflect national and regional transport policy. Suggest an improved reference to Travel Plans and the role that the County Council as Highway Authority contributes to the implementation of the Core Strategy is advisable. In particular, an emphasis on travel planning in delivering the mobility management approach that is an important element of the Regional Transport Strategy is justified. Advise a reference to the Transport for Surrey Partnership Board in the accompanying text and in the glossary.</p> <p>Para 9.49, may be altered to read as follows: 'This policy identifies areas where the Council will work with the County Council, the Transport for Surrey Partnership Board and transport providers...'</p> <p>Para 9.57 could be altered likewise: 'The Council will work in partnership with Surrey County Council, the Transport for Surrey Partnership Board and transport providers...'</p> <p>A note could be added to the LDF glossary to explain the Transport for Surrey Board as follows: 'The Transport for Surrey Partnership Board was set up by Surrey County Council and brings together a range of stakeholders including the county council, the boroughs and districts, Highways Agency, Network Rail, rail and bus operators, regional bodies and Surrey Police. The aim is to provide an integrated transport system for Surrey, to improve coordination and partnership working, and make the best use of resources.'</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>Guildford Hub Transport Improvement The County Council are developing a new major transport scheme that is relevant to the LDF, particularly Policy CP8 on integrated transport. The following could be added to the accompanying text: "The Guildford Hub Transport Improvement is being developed by the County Council as a major scheme to support the role of Guildford as a regional hub. It will include significant expansion of park and ride, bus priorities and other measures to reduce congestion and improve accessibility around the town." It would be helpful if Policy CP8 included travel to schools as a key consideration. An integrated transport system as a means of facilitating sustainable transport to school needs to take account of schools tending to be located within the communities that they serve in urban areas.</p> <p>Third round of Local Transport Plans The Core Strategy correctly refers to Surrey's second Local Transport Plan published in 2006, and this does not need to be altered. However a draft guidance for the third round of LTP's was published in December 2008, with final guidance due in summer 2009. Our third LTP is required to be in place by end March 2011 and where relevant this will need to be reflected within the LDF as successive stages are reviewed and updated. These comments therefore will also need to be taken into account in the Transport Statement that the Borough is currently preparing. Page 50 within the boxed policy text at the start of bullet 1, the words "Where possible" are weak and should be deleted. And for bullet 3, the words "Assessing development proposals in relation to the standards" do not sufficiently imply that proposals should comply with parking standards and should be changed to something like "Development proposals should comply with the standards" On pages 50-51 under para. 9.47, suggested replacement of words. On page 51, under para. 9.48, suggests a change to the first sentence. At the bottom of page 51/top of page 52 (and on page 55) the text indicates that the transport model evidence base is under preparation and not available until late summer 2009. The County Highway Authority reserves the right to make further comments on the movement-related policies in the Core Strategy once this information is released and reviewed. We note that the table on page 5 does not appear to reference the transport model evidence on the right side as a step in the adoption of the Core Strategy.</p>
	(d.)	Wanborough Parish Council	Para 9.47 - Would be better to encourage reduced car use rather than punish car use.
	(e.)	Guildford Environmental Forum	Suggest bullet 3 modified to include: "Car parking changes to be indexed to car emissions".
CP7	(a.)	CPRE Surrey Branch Guildford	Supports this policy but is doubtful from past experience as to how well cooperation between the Highways Agency, Surrey County Council and Guildford Borough Council works. Top priority should be given to resolving how to deal with the increase in traffic at Guildford that will result from the Hindhead Tunnel opening. The provision of a Park & Ride site at Merrow should not have been given priority when alternative sites were needed for urgent development on the A3. Recognition that much of the Park & Ride traffic at Artington meets the needs of rail commuters rather than shoppers.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Downsedge Residents' Association	Paragraphs in box. Acceptable except for last bullet point, in which replace “a move away from the private car to more sustainable” with “to reduce the use of private cars and increase the use of” Paragraphs 9.49-9.51 and 9.53-9.56. Acceptable. Paragraph 9.52. Delete whole paragraph. These measures would be political decisions which might have the unintended consequence of persuading employers and shoppers to move to more car friendly towns.
	(a.)	Effingham Parish Council	SUPPORTS this.
	(a.)	Guildford & Waverley Friends of the Earth	Urge the council to recognise that the most effective ways to promote walking and cycling are to address the design of roads and junctions themselves. In order to effectively encourage more walking and cycling impassable junctions, inconvenient underpasses, and narrow pavements must also be addressed.
	(a.)	Guildford Business Forum	Supports this policy. Guildford Borough Council must work harder with Surrey County Council and other transport providers to deliver transport improvements. Welcome the fact that the Council is no longer considering congestion charging as an option.
	(a.)	Guildford Cathedral	The dean and chapter support this policy. We welcome the fact that the council is no longer considering congestion charging as an option.
	(a.)	Guildford Constituency Labour Party	Strongly supports. Only by following this policy energetically will Guildford be made friendlier to the person not using a car and diminish the contribution transport makes to global warming.
	(a.)	Guildford Society	See comments under transport
	(a.)	Highways Agency	Generally supportive of the content of this policy, it also believes that car sharing can be included as one of the measures. Agrees that alternatives to car use must offer a realistic and proven alternative to the car to ensure that they are sufficiently attractive for people to use. Paragraph 9.50 - The HA is pleased to note that it has been included as a key partner in reducing the need to travel.
	(a.)	Highways Agency	Is aware that modelling work has been undertaken as part of the transport statement for the evidence base. Keen to see the results of this modelling. Will also offer assistance where appropriate with any model development.
	(a.)	John Moore Trust	The proposals are still based on the car rather than encouraging either walking, cycling or the use of public transport. Park and ride mandates the use of the car, reduces congestion in Guildford town but increases pollution elsewhere and does nothing to improve drivers health. There appears to be a total neglect of the use of the railways when the borough is serviced by twelve stations. An alternative service would be to provide pedestrians with local shuttle bus service to the stations and provide cyclists adequate free cycle parking at the stations. At present pedestrians and cyclists could be encouraged to use the Park and Ride facilities by providing walking and cycling routes to the car park and free cycle parking. Encourage people to cycle by providing free and secure cycle parking to all car parks in the Borough.
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	Policy makes reference to improving public transport and enhancing sustainable transport routes serving Guildford Town Centre. This approach is supported in principle. An alternative for consideration which would assist in this objective would be to allow for mixed-use development adjacent to the sustainable transport routes and well related to Guildford Town centre. Paragraph 9.55 (page 53) makes reference to Park and Ride facilities which are “central” to the transport strategies. The existing Park and Ride facility at Artington lies near to an area to the south of the town which could be considered for a mixed-use urban extension which could utilise this facility.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	SEERA	Welcome these policies and recognise the need to work in partnership with the Highway Authority, Surrey County Council, and the links with the LTP. The supporting text could also usefully explain how the policies will support the role of the regional spokes that relate to the borough.
	(a.)	Shalford Parish Council	Commitment to 'ensuring that the walking environment in Guildford Borough is safe, convenient, comprehensive and, wherever practicable, wheelchair and pushchair friendly'. This statement is particularly welcomed in Shalford. The two mains roads which run through Shalford act as barriers for pedestrians
	(a.)	Solum Regeneration Partnership	Object - Considers that a further objective should be "improving pedestrian connectivity to the rail station through more direct routes". This would be facilitated through the redevelopment of land at Guildford station which could benefit the viability and attractiveness of developments such as that proposed at the Bedford Road Car Park site and would encourage more shoppers and visitors to travel to Guildford by rail. Reference should be made to the benefits of an enhanced and modernised rail station in improving transport choice.
	(a.)	University of Surrey	Supports this policy. Transport is a key issue facing the borough with congestion a significant problem. Guildford Borough Council must work harder with Surrey County Council and other transport providers to deliver transport improvements. Welcomes the fact that the Council is no longer considering congestion charging as an option.
	(a.)	Wanborough Parish Council	Whilst Parish Council members agree with the aspirations of this policy there is concern that it will require substantial funds. Likely that alternative means of powering vehicles will be instigated within the same time frame as this strategy. Congestion will then be the major objection to the use of private cars. Therefore there will still be a need to provide access and parking for cars within the City centre and the variety of 'out of town' facilities. Electrical charging points are also to be considered likely. Nothing to address the problems of the majority of existing residents throughout the Borough for whom the car is an essential part of their everyday way of life and will remain so no matter what emphasis is given to cycling, walking and public transport.
	(a.)	Wilmslow owners of the Friary shopping centre	The owners are generally supportive of this policy. Important that additional shopper parking in the town centre is not ruled out as part of a comprehensive package of transport measures. Important that demand management measures do not have unintended and undesirable effects. Any decision to impose constraints on existing or future car parking must considered holistically, along with encouragement for park and ride. Any policies which seek to increase parking charges could have the unintended effect of reducing retail demand.
	(b.)	Guildford Environmental Forum	A new analysis of traffic through Guildford is needed to focus congestion reduction measures. Some kind of road pricing within the borough will be needed.
	(b.)	Highways Agency	Paragraph 9.55 Park and Ride - supports the principle of park and ride sites but the SRN impact would need to be carefully considered. Should be located where they can intercept existing traffic and not where they would generate additional trips. Transport Assessments will be required for any sites put forward, to complement this a reduction in town centre parking would also be expected.
	(b.)	Member of the public	Should be encouraging the use of low carbon alternatives, such as low carbon and low emission electric and plug-in hybrid vehicles by providing the appropriate infrastructure.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Guildford Environmental Forum	Para 9.40 – 9.56: Traffic speeds in residential areas need to be restricted for safety, noise pollution control, to encourage young and old cyclists to return to the roads, and for pedestrians. Road damage (potholes) is an issue with the public as is the high cost of road maintenance. A new bullet is suggested: “A new courtesy relationship between motorised transport, pedestrians and cyclists will be introduced using the shared space concept for roads, particularly in residential areas”. Secondly, “To reduce ever growing traffic noise a 50 mph speed limit will be rigorously imposed on the A3 and other A roads near residential areas”.
	(d.)	Guildford Society	There is no such thing as a “sustainable transport route” according to the definition provided. The reference to cycle parking standards in new developments should be moved to CP6. The second bullet point should include both the University and the Cathedral. The highly commendable points 9.49 to 9.56 are not encapsulated in the main Core statements.
	(d.)	Member of the public	The policy needs to give more attention to addressing the strong feedback about the inadequacy of bus services and recognising that many people in the northern part of the Borough commute to London via Woking and therefore the ability to cycle from eg Send to Woking station needs to be massively improved.
	(d.)	Surrey County Council	Page 52, suggest that, within the boxed policy text, bulleted points 4 and 5 appear to have a lump of text missing. In bulleted point 6 at the bottom of page 52/top of page 53, whilst the stated objectives are laudable, the text should set out transport improvements that are practicable and achievable.
	(d.)	Surrey County Council	<p>Policies CP6 –CP8 consistent with the County Council's approach to transport as set out in the second Local Transport Plan and can therefore be SUPPORTED. They also appear to reflect national and regional transport policy. Suggest an improved reference to Travel Plans and the role that the County Council as Highway Authority contributes to the implementation of the Core Strategy is advisable. In particular, an emphasis on travel planning in delivering the mobility management approach that is an important element of the Regional Transport Strategy is justified. Advise a reference to the Transport for Surrey Partnership Board in the accompanying text and in the glossary.</p> <p>Para 9.49, may be altered to read as follows: 'This policy identifies areas where the Council will work with the County Council, the Transport for Surrey Partnership Board and transport providers...'</p> <p>Para 9.57 could be altered likewise: 'The Council will work in partnership with Surrey County Council, the Transport for Surrey Partnership Board and transport providers...'</p> <p>A note could be added to the LDF glossary to explain the Transport for Surrey Board as follows: 'The Transport for Surrey Partnership Board was set up by Surrey County Council and brings together a range of stakeholders including the county council, the boroughs and districts, Highways Agency, Network Rail, rail and bus operators, regional bodies and Surrey Police. The aim is to provide an integrated transport system for Surrey, to improve coordination and partnership working, and make the best use of resources.'</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>Guildford Hub Transport Improvement The County Council are developing a new major transport scheme that is relevant to the LDF, particularly Policy CP8 on integrated transport. The following could be added to the accompanying text: “The Guildford Hub Transport Improvement is being developed by the County Council as a major scheme to support the role of Guildford as a regional hub. It will include significant expansion of park and ride, bus priorities and other measures to reduce congestion and improve accessibility around the town.” It would be helpful if Policy CP8 included travel to schools as a key consideration. An integrated transport system as a means of facilitating sustainable transport to school needs to take account of schools tending to be located within the communities that they serve in urban areas.</p> <p>Third round of Local Transport Plans The Core Strategy correctly refers to Surrey's second Local Transport Plan published in 2006, and this does not need to be altered. However a draft guidance for the third round of LTP's was published in December 2008, with final guidance due in summer 2009. Our third LTP is required to be in place by end March 2011 and where relevant this will need to be reflected within the LDF as successive stages are reviewed and updated. These comments therefore will also need to be taken into account in the Transport Statement that the Borough is currently preparing.</p>
	(d.)	Vail Williams	Supports the provision of Park and Ride sites and extension to that service where possible. A partnership is required with Surrey County Council, Guildford Borough Council together with major organisations in and around the Hospital in particular.
	(e.)	Guildford & Waverley Friends of the Earth	Additional bullet point: • promoting shared road space, and addressing key junctions and crossings acting as a barrier to pedestrians and cyclists
	(e.)	Guildford Environmental Forum	Suggests “Measures to discourage use of the private car will include:”.
	(e.)	Guildford Environmental Forum	Fourth bullet point: Suggest “Improving the provision of affordable public transport..” There needs to be a financial incentive for people to switch from the car to public transport as well as a frequent, accessible service. Second bullet point should read: “a network of safe walking and cycling routes will be provided linking communities, “. Notes that the Guildford Cycle Strategy is unlikely to meet its target of trebling the number of cyclists by 2010.
	(e.)	Highways Agency	Suggests that examples of possible measures to address congestion are included within this paragraph. The improvements to public transport as noted in paragraph 9.54 will be vital in attracting people away from their cars and towards the more sustainable modes of transport.
	(e.)	Holy Trinity Amenity Group	Fully supports all the proposals for meeting the objective. We would like added: Creating pedestrian priority wherever possible in and around the town centre. Walking will not be attractive so long as pedestrians are treated as of less importance than vehicles. MSG4 – comment as above.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	SEERA	Paragraph 9.52 of the supporting text refers to reducing the supply of long stay commuter parking. Appears to conflict with Policy T4 and paragraph 8.18 of the Proposed Changes, which encourage the favourable consideration of proposals to increase the provision of car parking at railway stations, particularly those associated with regional hubs. Would welcome clarification.
CP8	(a.)	Blackwater Valley Friends of the Earth	Easy access for cycle routes to railway stations should be added to policy. Bus and railway companies integrating timetables should be added to policy.
	(a.)	CPRE Surrey Branch Guildford	Supports this policy. Wonder whether it would be better to combine Policies CP7 and CP8.
	(a.)	Downsedge Residents' Association	Paragraphs in box, Add a new bullet point "instituting complementary ticketing". (This is likely to be a sufficient incentive to be worth including in the policy itself and not just in the supporting text). Paragraphs 9.57-9.59 Acceptable.
	(a.)	East Guildford Residents Association	This policy is supported. However, GBC itself has recently submitted a planning application for its own Bedford Road site that completely ignores this policy.
	(a.)	Effingham Parish Council	SUPPORTS this.
	(a.)	Guildford & Waverley Friends of the Earth	Park & Ride sites act as an additional subsidy to car drivers and take scarce funds away from other schemes which are more effective. Several studies into the effectiveness of P&R sites has shown that they actually increase levels of car use in the area surrounding a town as it reduces the overall generalised cost of making a trip by car, to the detriment of public transport and other modes. Cannot support the provision of additional P&R sites. High quality information is key to achieving integrated transport. Walking maps and schemes such as 'Wayfinder'.
	(a.)	Guildford Business Forum	Supports this policy, suggest the development of closer working between GBC and SCC Highways. The provision of more park and ride sites is supported.
	(a.)	Guildford Cathedral	The dean and chapter support this policy. Transport is a key issue facing the borough with congestion a significant problem. GBC must work harder with SCC and others to deliver transport improvements. The provision of more park and ride sites should be supported.
	(a.)	Guildford Constituency Labour Party	Strongly support
	(a.)	Guildford Society	See comments under transport
	(a.)	Highways Agency	Supportive of the approach taken in this policy.
	(a.)	Holy Trinity Amenity Group	Fully support the objectives, but suggest the additions: "ensuring pedestrian access to stations and bus stations is convenient, safe, welcoming, well-signed, and afforded full right of public use by adoption by Highways." Pedestrian routes must be treated at least on an equal basis with vehicle routes. Two specific improvements are so important to the future that they should be included: Establishment of proper train to bus transfer facility at the station. Establishment of a frequent and all day (including evening) "round the town" bus service from the station.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Member of the public	The amount of traffic passing through will only increase during the scope period of the plans. Acknowledged that better public transport is envisaged, and the park and ride schemes have been a great success, but more still has to be done. There has not been more to reduce congestion such as creating addition lanes between the Dennis roundabout and the Cathedral/university/Tesco/hospital junction, keeping the town traffic off the A3. In the town centre the gyratory system will get even more clogged. Consideration to the use of tunnels, and bridges linking Woodbridge Road, Farnham Road, Portsmouth Road and the Horsham Road should be evaluated. Looking 20 years hence, our roads will not cope.
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	3.69 The points made within this policy are supported, subject to comments made in earlier policies.
	(a.)	SEERA	Welcome these policies which include measures to manage travel demand and encourage the use of more sustainable forms of transport and the location of development close to services and recognise the need to work in partnership with the Highway Authority, Surrey County Council, and the links with the LTP. However, the supporting text could also usefully explain how the policies will support the role of the regional spokes that relate to the borough.
	(a.)	Solum Regeneration Partnership	Object - Support the principles expressed, however object to the omission of "sufficient operational railway station car parking" which is essential to allow commuters to travel by rail.
	(a.)	University of Surrey	Supports this policy, suggests the development of closer working between GBC and SCC Highways. The provision of more park and ride sites should be supported.
	(a.)	Vail Williams	Support the provision of additional Park and Ride sites.
	(a.)	Woolf Bond Planning on behalf Martin Grant Homes Ltd	<ul style="list-style-type: none"> • We agree with the Local Authority's objective to create an integrated transport system in the Borough • In particular, we support the provision within the policy for additional Park and Ride sites within the Borough.
	(d.)	GBC	It is essential that public transport hours are extended to areas outside the town centre.
	(d.)	GBC	The policy should also refer to the transport system being accessible. Currently routes going to Stoke are not reliable for wheelchair users or those with pushchair as the services lack consistency in their use of easy-access buses. They do not come at a particular time each hour.
	(d.)	GBC	Would be beneficial to consider introducing an oyster card type system to assist integrated travel for residents.
	(d.)	Guildford & Waverley Friends of the Earth	<p>CP8 Amended Text</p> <p>The Council and its partners will work towards the creation of a seamless integrated transport system that allows people to switch easily between public transport, walking, cycling and cars by : providing suitable drop-off points, ensuring pedestrian access to stations and bus stations is convenient, safe, welcoming, and well-signed; ensuring adequate, safe and covered cycle storage is provided at stations and bus stations; and providing high quality information at key locations and interchange points, including frequent walking maps.</p>
	(d.)	Guildford Environmental Forum	Integrated Transport: Think this policy lacks specific measures. Well integrated public transport is an absolute necessity if Guildford is to be sustainable, reduce congestion costs on business and meet the target CO2 cuts.
	(d.)	Member of the public	134-page document is not suitable for public digestion. In view of GBC's own current planning application 09/P/00239, CP8 is a joke. No serious attempt is being made to link the town centre with the railway station and thence the university.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Member of the public	Policy is written in very general terms and misses the opportunity in the north-eastern part of the Borough to make more of integrating transport provision around the rail facilities at Clandon and East Horsley stations, which are under used, and improving public transport links to Woking station.
	(d.)	Surrey County Council	<p>Page 56, within the boxed policy text in bullet 1, drop off points at bus stations should be discouraged and only provided at peripheral rail stations. Recommend revising the text of this bullet along the lines of "providing suitable drop-off points at rail stations that are located outside Guildford town centre."</p> <p>Page 56 in bulleted point 2, accessibility to stations should be for all travel modes, not solely pedestrians, and we therefore suggest delete the word "pedestrian".</p> <p>Page 56 within the boxed policy text in bulleted point 4, we suggest adding words along the lines that "extra P&R sites will be permitted where bus priority is available at opening, and where consistent with general transport policy and Surrey LTP objectives."</p>
	(d.)	Surrey County Council	<p>Policies CP6 –CP8 consistent with the County Council's approach to transport as set out in the second Local Transport Plan and can therefore be SUPPORTED. They also appear to reflect national and regional transport policy. Suggest an improved reference to Travel Plans and the role that the County Council as Highway Authority contributes to the implementation of the Core Strategy is advisable. In particular, an emphasis on travel planning in delivering the mobility management approach that is an important element of the Regional Transport Strategy is justified. Advise a reference to the Transport for Surrey Partnership Board in the accompanying text and in the glossary.</p> <p>Para 9.49, may be altered to read as follows: 'This policy identifies areas where the Council will work with the County Council, the Transport for Surrey Partnership Board and transport providers...'</p> <p>Para 9.57 could be altered likewise: 'The Council will work in partnership with Surrey County Council, the Transport for Surrey Partnership Board and transport providers...'</p> <p>A note could be added to the LDF glossary to explain the Transport for Surrey Board as follows: 'The Transport for Surrey Partnership Board was set up by Surrey County Council and brings together a range of stakeholders including the county council, the boroughs and districts, Highways Agency, Network Rail, rail and bus operators, regional bodies and Surrey Police. The aim is to provide an integrated transport system for Surrey, to improve coordination and partnership working, and make the best use of resources.'</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

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			<p>Guildford Hub Transport Improvement The County Council are developing a new major transport scheme that is relevant to the LDF, particularly Policy CP8 on integrated transport. The following could be added to the accompanying text: "The Guildford Hub Transport Improvement is being developed by the County Council as a major scheme to support the role of Guildford as a regional hub. It will include significant expansion of park and ride, bus priorities and other measures to reduce congestion and improve accessibility around the town." It would be helpful if Policy CP8 included travel to schools as a key consideration. An integrated transport system as a means of facilitating sustainable transport to school needs to take account of schools tending to be located within the communities that they serve in urban areas.</p> <p>Third round of Local Transport Plans The Core Strategy correctly refers to Surrey's second Local Transport Plan published in 2006, and this does not need to be altered. However a draft guidance for the third round of LTP's was published in December 2008, with final guidance due in summer 2009. Our third LTP is required to be in place by end March 2011 and where relevant this will need to be reflected within the LDF as successive stages are reviewed and updated. These comments therefore will also need to be taken into account in the Transport Statement that the Borough is currently preparing.</p>
CP9	(a.)	CPRE Surrey Branch Guildford	Supports this policy. Wonder whether sufficient consideration has been given to the growth of longevity in the population.
	(a.)	Downsedge Residents' Association	Text in box. Have some doubts as to the emphasis given to "social inclusiveness" . The ideas behind the first and third sentences in particular need to be spelt out. However the second, fourth and fifth sentences are clear and acceptable. Also suggest that 'inclusiveness' can relate to what people do in their spare time. Paragraphs 9.60-9.63 Apart from the last sentence of paragraph 9.61 these are acceptable.
	(a.)	Guildford & Waverley Friends of the Earth	Broadly agree with the approach to this policy but question whether it is right to refer only to residential development. Concerned that it appears that a significant quantity of new development is not intended to be included under this policy. Suggest 'residential' is deleted, as shown below.
	(a.)	Guildford Business Forum	Supports this policy of promoting social inclusiveness in the borough.
	(a.)	Guildford Cathedral	The dean and chapter support this policy of promoting social inclusiveness in the borough, and requiring all new residential developments to meet the code for sustainable homes standard.
	(a.)	Home Builders Federation	The Code for sustainable homes is not mandatory on new build dwellings. The Council should not seek to remove this flexibility through its own, unjustified, policies. There is no evidence suggesting that Guildford has any greater need for dwellings built to these standards and thus the national guidance of the Code for Sustainable Homes should be followed rather than a unilateral approach by Guildford.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	Policy seeks to promote new residential development which will encourage balanced communities. Approach is welcomed in principle, the Strategy will fail to achieve this as it is too restrictive in allowing for sites to come forward which will be able to achieve balanced communities. Over-reliance on Guildford Town Centre will only result in high-density flatted schemes. There is a need to identify sustainable urban extensions such as to the south of Guildford town, if balanced communities are to be achieved.
	(a.)	The Planning Bureau Ltd.	On behalf of McCarthy & Stone on the basis that the Council's approach is not entirely consistent with national strategy on the provision of housing for ageing society. In particular, the absence of any reference within the policy to the role that specialised forms of accommodation have in addressing housing needs of older people. The policy and supporting text does not properly reflect the guidance of the draft South East Plan as set out in Paragraph 4.1 above. It should be noted that the draft RSS does not rely solely on Lifetime Homes standards to address an ageing population it specifically mentions the need for a 'variety' of housing options including sheltered and extra care housing. The draft South East Plan also identifies that specialist forms of accommodation for older people help free up under occupied family sized homes. The Council need to consider that housing needs may be better addressed by freeing up larger properties from under occupation. The Council should be aware of the Planning Inspectorate response to the Poole Borough Council Core Strategy. The Council may also wish to consider the Inspector's comments at Paragraph 4.58 regarding Lifetime Homes Standards. It is therefore respectfully suggested that Policy CS9 be amended with an additional sentence at the end to read the following: 'The Council recognise the important role that specialised forms of accommodation for older people make to meeting the needs of an ageing population, and therefore proposals for the provision of specialised accommodation for older people will be positively encouraged.'
	(a.)	University of Surrey	Supports this policy of promoting social inclusiveness in the borough, and requiring all new residential developments to meet the Lifetime Homes standard as set out in the Code for Sustainable Homes.
	(a.)	Westborough, Broadacres & District Residents Association	Mentions "inclusiveness" and opportunities for people to be involved in consultation - there is little point to such activity if nothing is going to happen as a result of those consultations and the Council just stalls or does what it wanted to do in the first place.
	(b.)	Guildford Business Forum	Concerned about the proposal to require all new residential developments to meet the Lifetime Homes standard as set out in the Code for Sustainable Homes. The Council may not be aware of additional costs involved per unit of housing. Code performance targets are more demanding. Accept that they represent good or best practice, are technically feasible, and can be delivered by the building industry. For the borough to impose construction standards which are tougher/more expensive than the requirements of building regulations (as updated from time to time) may make developers less inclined to carry out developments within the Borough.
	(c.)	The Planning Bureau Ltd.	Lifetimes Homes is not the only answer to responding to housing needs of an ageing population. There is a significant role to play for specialised forms of accommodation for older people as advocated by PPS3 and the CLG document A National Strategy for Housing in an Ageing Society. The policy does not properly reflect approach taken by national policy.
	(d.)	East Horsley Parish Council	East Horsley is a village encompassing houses of mixed styles and sizes including the older more original styles (Lovelace included) and individual designs. If these Core Policies are implemented unsympathetically, the result could seriously change the style and feel of the village for the worse. CP9-CP13 could encourage mass produced estates and stereotype buildings to the detriment of the local architectural vernacular.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	The Planning Bureau Ltd.	Paragraph 9.62 - The Council need to promote and encourage specialised forms of accommodation for older people. This comment is no more than after thought and demonstrates that the LPA have not properly considered the need for these forms of accommodation both now and it the future. A separate report will be submitted providing further information on this Policy.
	(e.)	East Horsley Parish Council	Unclear what practical impact this policy would have on local building styles and appearance. Would appreciate more specific guidance on the implications of 'Lifetime Homes' construction requirements for the distinctive local architectural style.
	(e.)	Guildford & Waverley Friends of the Earth	Procedures used to allocate development sites and determine planning applications must have regard to the promotion of social inclusiveness in the Borough. Regard will be given to the opportunities, rights and resources that enable people to be involved and respond to consultations on planning applications, development and area plans. New development should promote social inclusiveness, encouraging balanced, lasting, vibrant communities to develop. Particular efforts should be made to provide environments and homes that are suitable for all, including regard for the requirements of the elderly and those with disabilities. To help to achieve this, all new build residential developments will be required to meet the conditions for Lifetime Homes set out in the Code for Sustainable Homes.
	(e.)	Holy Trinity Amenity Group	Social inclusiveness and community spirit is greatly aided by residents making journeys in their area by walking. Suggest add "Improvements to pedestrian facilities and the creation of "Living Streets" will help in meeting these objectives."
CP10	(a.)	Carter Planning Limited	No
	(a.)	CPRE Surrey Branch Guildford	Has severe reservations about the West Surrey Strategic Housing Market Assessment. Attended the consultation on this topic which took place before the report had been published. Does not agree that Guildford, Waverley and Woking should be considered one Housing Market Area.
	(a.)	Downsedge Residents' Association	<p>Paragraphs in box. This Core Policy needs to be rethought and rewritten, for several reasons:</p> <ul style="list-style-type: none"> •Policy implies that it will be possible to meet demand (or need) for housing within the area of Guildford Borough. Demand for housing there will always exceed supply. •The policy depends on findings of the Strategic Housing Market Assessment. A Downsedge representative attended a presentation of the interim findings of this research and was not convinced of the validity of the approach. There should not be over-reliance on the findings of this assessment. •If a mixed community means suitable housing for people of all ages, this is fine, and there are already examples of this In Guildford. But deliberate mixing of people with different income levels to provide a mix may not be kind. Suggest therefore that a much more tentative approach to "mixed" or "balanced" communities would be wise. Happy with the second sentence of paragraph 3, and with paragraph 4, in the box. <p>Paragraph 9.64 (a) There is generally thought to have been an overprovision of 1 and 2 bedroom flats in the past few years. Over the years careful monitoring should try to match provision with demand/need.</p> <p>Paragraph 9.65 (a) Depends on rewrite of policy.</p> <p>Paragraph 9.66 (a) There appears to be a non sequitur here. Probably best to delete.</p> <p>Paragraph 9.67 (a) Delete. Housing officers can state an opinion but the Planning Committee decides.</p> <p>Paragraph 9.68 (a) Acceptable</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Business Forum	Strongly supports policies that provide housing to meet local needs. Support the lowering of thresholds to 10 homes or more, to ensure new residential developments provide an appropriate mix of size and type of dwelling to meet housing demand as identified by the Strategic Housing Market Assessment.
	(a.)	Guildford Cathedral	The dean and chapter strongly support policies that provide housing to meet local needs. The dean and chapter support the lowering of thresholds to 10 homes or more.
	(a.)	Guildford Society	<p>Preamble to CP10: Page 60 – MSG5 - What is the definition of “diverse and balanced communities”?</p> <p>CP10: Line 2 – Delete (houses or flats)</p> <p>Line 5 - -Delete “could lead to an unbalanced community”.What exactly would be the definition of an unbalanced community?□</p> <p>Para 2 – Delete 1st sentence – too prescriptive</p> <p>Para 4 – Delete “where a need remains” . How would this need be identified? Developers should provide justification that there is no identified need for the specialist types of home – and what exactly are these types of homes? – Need to specify.</p> <p>Para 9.64 What is a “smaller home” – Should be identified as a mix of accommodation sizes to meet demand. It is generally accepted that the preponderance of developers building 1 & 2 bedroom flats has resulted in an overprovision of this type of accommodation. An assessment/study of this position needs to be undertaken to ensure that the accommodation mix is in balance with the demand.</p> <p>Para 9.66 ..”so the average size of new homes will generally be smaller than in suburban and rural locations”. Far too prescriptive – how could this actually be delivered?</p> <p>Para 9.67 Delete – Council’s housing officers should not determine/ensure a suitable size and type mix for that locality. Housing officers can provide housing demand assessment to planning officers to take account of in their assessment of planning proposals.</p> <p>Para 9.68 Definition of specialist types of home should appear earlier in the document or in Annex II (see comment under para 4 above.)</p>
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	This ‘aspiration’ is supported in principle. However it does not identify what these needs are or how these are to be met. “West Surrey Strategic Housing Market Assessment” Executive Summary February 2009 published after Core Strategy. Little difference to previous West Surrey Strategic Housing Market Assessment Executive Summary March 2008. No explanation for the delay of SHMA, although page 62 comments on a new Housing Needs Survey for Guildford Borough expected to be completed in spring 2009. Limited reference to SHMA in Core Strategy.
	(a.)	Solum Regeneration Partnership	Object - Consider the second paragraph should be reworded and changed to read “and all other major developments that may come forward within the plan period will include a range of dwelling mix that is appropriate to the location and will contribute to balanced communities”
	(a.)	Surrey County Council	SUPPORT the reference (Section 9.68) to the Lifetime Homes standard and the Code for Sustainable Homes as baseline requirements for mixed communities with a high level of design parameters for a wide range of dwellings to support the Borough’s population needs.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	The Planning Bureau Ltd.	<p>On behalf of McCarthy & Stone. It is considered that Policy CS10 is not consistent with national planning policy and indeed its application could result in it being directly contrary to national planning policy contained within PPS3. Objection is to residential schemes of at least 10 dwellings will be expected to provide an appropriate mix of size and type on the site to meet housing demand. PPS3 reference to the provision of a range and mix of dwelling types is contained at Paragraph 24 where by on 'large strategic sites' there should be a mix of household types and tenure types. On smaller sites the housing should contribute to the creation of mixed communities. In relation to the proposed policy I do not consider that sites of 10 dwellings constitute a 'large strategic site' and that it is not necessary for smaller sites to provide a range and mix of dwelling types but that the proposal contributes to the wider objectives of creating mixed and balanced communities. In this respect Policy CS10 is not consistent with national planning policy PPS3.</p> <p>It is also important to consider that PPS3 requires that sites are developed effectively and efficiently. But if the requirement is for the provision of different types of size of dwelling i.e. larger units then the total yield from the site would be reduced and the site would not be developed as efficiently and effectively as it could, and therefore would be contrary to PPS3. This threshold could have significant effects for the overall housing supply the Council are required to deliver within the plan period.</p> <p>Equally, it may provide policy support for developers to circumvent Policy CS12. There would seem to be a potential for a conflict of interests between this policy and policy CS12.</p> <p>It would also not be possible to provide a range and mix of dwelling types for certain types of households i.e. families etc. in certain specialist forms of accommodation such as sheltered and extra care housing.</p> <p>Would support the final sentence of Policy CS10 that loss of specialist homes should be resisted, however rather than just be protectionist it is considered that this policy should also be pro active and positively encourage the provision of specialist form of accommodation.</p>
	(a.)	University of Surrey	Strongly supports policies that provide housing to meet local needs. Supports the lowering of thresholds to 10 homes or more, to ensure new residential developments provide an appropriate mix of size and type of dwelling to meet housing demand as identified by the Strategic Housing Market Assessment.
	(a.)	Vail Williams	No - Paragraph 9.67 is unnecessary as it duplicates the requirements set out in paragraph 9.65. National Policy in PPS3 clearly sets out the approach to size, types and mix of dwellings.
	(a.)	Westborough, Broadacres & District Residents Association	Talks about homes for all. If the Borough Housing Department managed the local Social Housing stock with a bit more alacrity and business-like attention, many more temporary homes would suddenly appear for key workers and genuine people in need of social housing.
	(b.)	Carter Planning Limited	Yes - the provision of guidance on % mix should be incorporated in the Policy, " an appropriate mix" is too uncertain.
	(b.)	Home Builders Federation	<p>There is no reason why the size of development should be measured in gross development. The measurement should be in net dwellings. There is no direct correlation between falling household size and those purchasing new build properties. One of the main drivers of decreasing household size is the fact that people are living longer yet one partner of a couple dies.</p> <p>Similarly the fall in household size is driven by divorcing couples, often with children. Both parents will, therefore, require a dwelling capable of housing their children given the common occurrence of joint custody.</p> <p>Thus, while HBF is supportive of providing dwellings for all, of all sizes, types and tenures, this should be a decision for the developer rather than that of planning policy.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(c.)	Carter Planning Limited	Yes if modified and more detailed
	(d.)	Barton Willmore	Does not accord with national planning policy guidance in PPG3. It is unsound on this basis. The aim for the development of mixed communities including the provision of affordable housing of different sizes and tenures is supported. Policy CP10 requires development of at least 10 homes (gross) to provide an appropriate mix of size and type onsite to meet the housing demand in the Strategic Housing Market Assessment (SHMA). The threshold included in Policy CP10 is not in accordance with the national indicative minimum size threshold set out in PPS3. PPS3 paragraph 30 refers to a minimum threshold of 15 dwellings, Policy CP10 should be amended to accord with this national planning policy guidance. In general, the Policy wording is unclear on its reference to affordable housing and should be amended
	(d.)	Burpham Community Association.	All major development areas need to be identified. The statement "all other major development sites that may be developed during the plan period" pg60, means areas like Burpham could be harder hit. Better understanding is require as to how and where Burpham will be expected to accommodate smaller housing to create a Balanced Community. Does this mean squeezing housings onto subdivided land? Who determines if land is under-utilized?
	(d.)	Carter Planning Limited	No
	(d.)	Send Parish Council	p. 60 It was agreed that all housing developments should contribute to the continued development of mixed communities by providing a suitable mix of sizes and types of dwellings. With reference to the requirement that developments of at least 10 homes would be expected to provide an appropriate mix of size and type on the site to meet the housing demand identified by the Strategic Housing Market Assessment. Include a further requirement: An increase in 1 bed homes was needed to meet current needs on developments with over 10 dwellings.
	(d.)	Wanborough Parish Council	Policy CP10(d) and 11(d) New-build policy should be flexible as demand will obviously vary over the next 20 years, and there is some concern that an undue emphasis on maximising the density of new-build housing will be out of kilter with the demand for more family-biased accommodation, for example with garden access.
	(e.)	Barton Willmore	' . . . All developments must contribute to continued development of mixed communities by providing a suitable mix of sizes and types (houses or flats) including for particular groups, reflecting the needs identified in the Strategic Housing Market Assessment, including affordable housing. Developments of at least 15 homes (gross) will be expected to provide an appropriate mix of size and type on the site to meet the housing demand identified in the Strategic Housing Market Assessment.'
	(e.)	Carter Planning Limited	Yes - the provision of guidance on % mix should be incorporated in the Policy, " an appropriate mix" is too uncertain.
	(e.)	East Horsley Parish Council	The rationale for and intended outcome of encouraging re-use of empty or supposedly under-utilised property is, as drafted, unclear. Would prefer more explicit policies encouraging conversion of existing large and medium sized properties into multiple-occupation (eg retirement) dwellings, of which there is a shortage in East Horsley, so that the architectural character of the present buildings is not lost. This would be preferable than replacement dwellings.
	(e.)	The Planning Bureau Ltd.	PPS3 is more specific to the groups that the Council should have regard to in meeting the objectives of Homes for All. Please see Paragraph 21. The Council's reference to "particular" groups is too vague and does not adequately reflect PPS3 commentary. Suggest the policy is amended to specify "particular" groups. PPS3 can do it at a national level, GBC should be able to do it at a local level.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
CP11	(a.)	Abbotswood Residents Association	It is essential that the importance of the Residential Design Guide is maintained in future. Fully support the reference to the Guide in the policy.
	(a.)	Barton Willmore	The policy appears to be largely national policy and is also considered to be a detailed development management type policy which should not be included within a Core Strategy.
	(a.)	Barton Willmore	PPS12 does not require Core Strategies to repeat or reformulate national planning policy guidance (paragraph 4.30 refers). Policy CP11 appears to be largely national policy and is considered to be a detailed development management type policy which should not be included within a Core Strategy. Policy CP11 sets a maximum density for very accessible areas. PPS3 encourages the efficient use of land and includes guidance on minimum densities (30 dwellings per hectare), however does not set out maximums. PPS3 prefers that density of development is led by design, high quality, well considered designs and layouts are encouraged to achieve more efficient use of land without compromising the quality of the local environment. Policy CP11 should be removed from the draft Core Strategy.
	(a.)	Carter Planning Limited	Yes
	(a.)	CPRE Surrey Branch Guildford	Supports this policy. Concerned that high density should not be obtained by means of multi storey development that harms the character and appearance of the town. The tower blocks built at Woking would not be appropriate for Guildford.
	(a.)	Cranleigh Road Area Residents Association	Para.2 – endorse in its entirety
	(a.)	Crownhall Estates	Approach will lead to continued friction in the urban area of Guildford by supporting high density flatted development in areas where it is not appropriate. Careful, considered, incremental release of land on the edge of towns and villages will bring about a better more balanced way of life for future residents.
	(a.)	Downsedge Residents' Association	Text in the box. General issues. (a) Housing density is a political hot potato and this Core Policy would benefit from considerable amendment. Issues include: •Much of the policy will be affected if rulings on density revert to the control of the Council rather than being influenced by government policy and advice. Wise to omit all references to specific density levels from the Core Policy itself, although they may have to be included pro tem in the supporting text. •Terms such as “most efficient use of land”, “best use of land” are clearly used in this document as codes for maximising density. But an alternative case could be made for their use.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Downsedge Residents' Association	<p>Text in box. Specific amendments (e) First paragraph (ending are “local distinctiveness”) Delete. In the second paragraph delete “also” in the preamble and add to the list: local context and character, the need to reinforce local distinctiveness, topography, and land levels, the capacity of the local infrastructure (especially roads). In the third paragraph delete the first sentence. In the fourth paragraph delete the second sentence. Delete the last paragraph.</p> <p>Paragraphs 9.69-9.71. (a) (e) Paragraph 9.69. Delete “Efficient”. Paragraph 9.70. Acceptable. Paragraph 9.71. Essential.</p> <p>11/89. Text in box. (a) generally support the policy, expect that there will be many unintended side effects. (e) First paragraph. Delete all after “2026”. Second paragraph: unclear what is meant by “after adoption”. Third paragraph , after “policy” delete all up to “Character)” and replace with “by limiting the development to just below the thresholds of 5 and 15 dwellings as required by the previous paragraph”. Fourth paragraph, first line, replace “will be” with “should be” and delete “be fully integrated in the development” [see our comments on CP 10]. Fifth and sixth paragraphs: Acceptable. Seventh paragraph: Delete “within the London Fringe sub-region”. Last two paragraphs: Acceptable. Paragraphs 9.72-9.79. Think that the SHMA’s findings are suspect and should prefer less reliance on this source in paragraphs 9.73, 9.76 and 9.77. In 9.76 the apparent precision of 1,194 is surely spurious. Also have difficulty in reconciling 9.77 and 9.78. But the main thrust of these paragraphs is important.</p>
	(a.)	East Guildford Residents Association	<p>The reference to Guildford’s Residential Design Guide is fully supported. It is essential that this SPG remains in full force throughout the foreseeable future.</p> <p>However, the reference to maximum densities of 150dph (and even more) is wholly inappropriate. It is recommended that no specific figure be inserted, to put in a figure will give free rein to developers when arguing for excessive town cramming. Unfortunate that GBC has applied for 300dph on its Bedford Road site.</p>
	(a.)	East Guildford Residents Association	<p>Guildford’s Residential Design Guide (SPG July 2004) is mentioned on page 62 – policy CP11. This is a fundamentally important document, used by GBC planners, Residents and Inspectors – and it is vital that it remains in full force.</p>
	(a.)	Environment Agency	<p>Welcome the consideration of on-site constraints in determining the density of development to be considered. This is important in protecting, and enhancing, the natural environment.</p>
	(a.)	Guildford & Waverley Friends of the Earth	<p>It needs to be made clear that making the most efficient use of land includes making the most of aspect so that renewables can be optimized. At the moment the planning department is too constrained by considerations like building lines and you have to understand and make it clear that there is some flexibility in the system so that the orientation of new housing must maximise the potential for solar panels or the location must maximise the potential for ground source heat pumps. This is absolutely crucial and we think this is probably the most appropriate place for it to be dealt with in the core strategy.</p> <p>In considering density the other consideration is renewable energy supply. The critical mass needed for CHP is currently unclear, and it is changing all the time, but it should be a consideration.</p>
	(a.)	Guildford Business Forum	<p>Supports this policy and welcomes the flexibility that has been built into this policy. This will ensure that the density of new development is considered on a site specific basis, resulting in densities that are appropriate to the site and the local context.</p> <p>Supports a review of green belt boundaries to meet housing needs in sustainable locations, since housing land supply is unlikely to be able to meet needs in urban areas and village settlements alone.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Cathedral	The dean and chapter support this policy and welcome its flexibility. This will ensure that the density of new development is considered on a site specific basis. It is important that the integrity of the green belt is protected. The dean and chapter support the maintenance of the green belt boundary.
	(a.)	Guildford Society	<p>First para – Delete “In determining suitable densities” and replace with “In determining development proposals”. Delete (flats or houses).</p> <p>Second para – we note that the reference to 30dph is consistent with Government guidance in PPS3. We like the flexibility offered by the wording “normally be no lower”.</p> <p>Penultimate para – Delete “highest” and replace with “higher”. Delete last sentence referring to 150dph. Emphasis should be on Government guidance in PPS6, which wisely does not quantify density.</p> <p>Para 9.71 – replace “and continues” by “will continue” in order to make this quite clear.</p>
	(a.)	Guildford Society	<p>We ask for significant revision of this policy or subdivision into several policies such as views, town centre character, suburban and urban community character and greening the approaches.</p> <p>First paragraph Guildford's location means that demand is unlikely to be met. The challenge is to accommodate growth in a way that does not harm the character and other valued qualities that underpin the town's economic success. This is best achieved through case by case consideration of capacity compatible with character and valued qualities. “Gardens” should be added after trees and also “contribution to resilience to the effects of climate change”. “Contribution to the policy objective of greening the approaches to Guildford” should be added. Character of the area as described in the Landscape Assessment, should also be a factor.</p> <p>Criteria should be added to the first paragraph to deliver the advice from PPS3 (paragraph 46):</p> <ul style="list-style-type: none"> - Provides, or enables good access to, community and green and open amenity and recreational space (including play space) as well as private outdoor space such as residential gardens, patios and balconies. - Is well integrated with, and complements, the neighbouring buildings and the local area more generally in terms of scale, density, layout and access.... - seeks to adapt to and reduce the impact of, and on, climate change. - Takes a design led approach to the provision of car parking space, that is well integrated with a high quality public realm and streets that are pedestrian, cycle and vehicle friendly. - Creates or enhances a distinctive character that relates well to the surroundings and supports a sense of local pride and civic identity. - Provides for the retention or re-establishment of the biodiversity within residential environments. ” <p>Second paragraph - Case by case decisions based on landscape and design guidance, the sustainability appraisal and development briefs will be required, as PPS3 states.</p> <p>New paragraph</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>The above should be supplemented by reference to additional considerations that will be particularly important in determining appropriate densities in the town centre. "In the town centre, there will be significant variation in the density of dwellings and in the height, bulk and massing of buildings that will be appropriate due to: * Preponderance of narrow roads which will influence the height of buildings * Distinctive topography of a gap in the Surrey Hills which means that the form of development should complement the landform and natural features. * Rich heritage * Importance of views into and from the town, including the skyline and roofscape * Importance of, and need to enhance, the river corridor * Proximity to the boundary of the town centre"</p> <p>The need to enhance and extend the riverside open space should be taken fully into account in determining appropriate densities due to the need to pull back the building line and also to restrict the height of buildings along the river. A concerted, robust, long term strategy will be required but the potential gains will be major.</p> <p>Paragraph 3</p> <p>The above considerations have a bearing on density. 150dph is not a helpful indicative maximum and could be treated as a baseline to aim for. In determining appropriate densities, ease of access to transport needs to be weighed against the desirability of "greening the approaches to Guildford". Lower densities along some arterial routes may be very important in protecting and establishing green character and in increasing resilience to climate change.</p> <p>View Management Framework- Guildford owes its success as an international tourist attraction to its historic character. It is easy to see that charm slipping away as a result of inappropriate development. A policy concerned with views into and out of the town and from hill to green hill would be beneficial. These views form an important component of the town's charm and should be clearly safeguarded in the new planning structures. A "crusty" roofscape is important in any town where roof tiles predominate but particularly for a town on a hillside, such as Guildford.</p> <p>London has a well used View Management Framework SPG. Suggests to introduce such a policy for Guildford, a town built on hills that is set to undergo significant change.</p>
(a.)		Member of the public	<p>Object - It is unwise to quote specific indicative maximum densities, as this establishes what will be seen as a precedent. Suggest reference to PPS3 and its successors. The lower density figure of 30dph should be qualified as where the character of the neighbourhood will not be substantially harmed. Note that this principle is well established in Ministerial statements and Appeals.</p>
(a.)		Shere Parish Council	<p>Suggest a maximum in rural areas of 40 dph, which is still well in excess of your stated minimum of 30 dph. We note with concern however, the implication that in the Gomshall settlement area densities of 150 dph would be routinely acceptable for those parts within 0.5km of a railway station.</p> <p>Again, and this is by no means a trivial point, the precise location of the "railway station" is significant. The introduction of densities of 150 dph would obviously conflict with the rural character of the area. In practice the low level of service on the railway line would not justify any difference in the treatment of that settlement area compared to others.</p>
(a.)		Solum Regeneration Partnership	<p>Support locating development within 500m of the train station and support higher densities of 150 dwellings per hectare in accessible locations where no harm is caused to the character, amenities and infrastructure.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Surrey County Council	SUPPORT the approach to density, accessibility and the reference to local context and character as criteria constraining density requirements for new schemes. We would draw the Borough's attention to the increased number of school children that would be yielded from developments with a higher density and that this would increase the need to mitigate the effects of a development on educational facilities.
	(a.)	University of Surrey	Supports this policy and welcomes the flexibility that has been built into this policy. This will ensure that the density of new development is considered on a site specific basis, resulting in densities that are appropriate to the site and the local context. Supports a review of green belt boundaries to meet housing needs in sustainable locations, since housing land supply is unlikely to be able to meet needs in urban areas and village settlements alone.
	(a.)	Vail Williams	An upper limit of 150 DPH should not be specified given the content of PPS3.
	(a.)	Westborough, Broadacres & District Residents Association	Refers to Housing Density and Character. Past Planning Applications for Housing pass through without any public or committee scrutiny. If the Planning Officers were effective in their jobs, they would appreciate the actuality of Housing Density and local character of the applications they are charged with managing. They should get out and see the impact such applications would have and talk to the neighbouring occupants. If there really is a will in the Council to apply principle of Optimised Density and character, more than 50% of recent Planning Applications which went out for local consultation would have been rejected at the application stage.
	(b.)	Carter Planning Limited	no
	(b.)	Member of the public	Figures for density given in the Core Strategy could encourage developers to put in inappropriate applications to overdevelop sites which damage the historic character and scenery of the town.
	(c.)	Carter Planning Limited	yes
	(c.)	Guildford Society	Policies not Saved Page 126 of the Consultation lists seven Policies that 'were not saved for future use', and hence will not be replaced: H10: New Residential Development, which specifies densities (e.g. 30-50 dpha) and mix of dwelling sizes etc. This is replaced by CP11: Housing Density and Character which emphasizes 'most efficient use of land'. It refers to the Guildford Residential Design Guide. The paragraph on mix of sizes in H10 is covered in CP10: Homes for All. CP11 has a new paragraph on densities in the town centre. It specifies an indicative maximum density of 150dpha, but then goes onto say it can be exceeded. We think this could be used to justify extreme town cramming because (a) developers will always argue that no harm results and (b) the Council is under pressure to provide as many dwellings as it can in the urban area. We think that 150dpha is too high and is not supported by the PPS's. We think the Council should not tie its own hands in this way. We recommend that there should be no specific density figure for the town centre in CP11. Other criteria should be given prominence – see comments under Theme 1.
	(d.)	Carter Planning Limited	No
	(d.)	Highways Agency	Recommend that in addition to the accessibility of public transport, pedestrian and cycle facilities should also be included for determining suitable densities. The aim to ensure demonstration of the efficient use of land, particularly previously developed land to ensure sustainable development is also supported.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Carter Planning Limited	The section “In determining ...to... residential amenities” should be deleted. This provides a level of detail that is not appropriate. It is not exhaustive. It will have the effect of driving densities downwards. These are development control matters that are best left for detailed consideration or can be considered under other Proposed Policies.
	(e.)	Guildford & Waverley Friends of the Earth	New residential development will be required to make the most efficient use of land to support housing, whilst responding to their local context and character, <i>meeting the demands of climate change</i> and creating, or reinforcing local distinctiveness. In determining suitable densities, consideration will also be given to: - ... - <i>optimizing the potential for renewable energy</i> Residential densities will ... infrastructure would result. All residential development will be expected to demonstrate the most efficient use of land commensurate with the character of the area <i>and the demands of climate change</i> , to ensure that the borough is developed in a sustainable manner.
	(e.)	Holy Trinity Amenity Group	Welcomes the inclusion in the Strategy of The Residential Design Guide. With regards to the clause has been added regarding maximum densities. This is too weak and vague, but probably the best we can hope for. The new and extra 500m criteria when applied to the main and London Rd. stations takes the super high density a bit beyond the “town centre” to which the “super high” density was previously limited, and means that a small amount more of our area is at risk from these developments. We are disappointed by this but accept that the change is small. Ask for two essential criteria for determining acceptability of densities, particularly super high ones, to be added: Availability of public open space nearby. Average existing dwelling density in the area. Our view is that the density across a whole area must not exceed 50dph – a quality environment cannot be maintained at higher average densities than this.
	(e.)	Horsley Countryside Preservation Society	We are concerned at the prevalence in all rural areas whereby applications for the demolition of a smaller house/bungalow, to be replaced by one large (5 or 6 bedroom) house can be approved, without much difficulty. If continued will alter the complete the character of the area. If a more robust rule where in place e.g. 'to limit the increased size of the existing house footprint, by a % age limit, say 15-20%'. Unless there are firm guidelines in place, as suggested, the intentions of the general plan can be circumvented, by use of the appeals procedure, which can be somewhat arbitrary.
	(e.)	Member of the public	Agree with the parameters laid out in paragraph 1, page 62, but suggests the specific reference to 300 dph is removed '.. Areas suitable for development across the borough may vary considerably and so ‘responding to their local context and character, and creating or reinforcing local distinctiveness’ is difficult to do if one also aiming to meet a specified dph target.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
CP12	(a.)	Alliance Planning	<ul style="list-style-type: none"> • The current basis for provision is contained in the Council's Infrastructure SPD (2006), which states that the Council will normally request 35% affordable housing. Given today's exceptionally poor market conditions it is considered poor policy to further increase the burden on developers, The increase in thresholds and percentage of provision (developments of between 5 and 14 units are to provide 20% affordable housing in the first two years after adoption, rising to 40% after this time and those developments of 15 or more units will have to provide for 40% from the outset) will further inhibit the provision of any kind of housing in the Borough. • We therefore question the evidence base on which assumptions have been made and the policy formulated, it is considered that if research was undertaken in today's current market conditions (so during 2009, not a year ago as stated in paragraph 9.80 of the Strategy) the conclusions reached would likely to be very different • The council should be aware that the affordable housing targets means some developments will be undeliverable and so no development will take place at all which will impact on housing figures. * Policies need to be flexible to take into account the current drop in land prices compared to their previous prices, which means many developments are no unviable. • With this in mind it is considered that greater emphasis in Policy CP12 needs to be given to the issue of viability. It is considered that the economic data on which Policy CP12 was formulated on (circa April 2008) is out of date, thus hindering a informed assessment of economic viability in today's climate. • Respondent makes suggestion to an amendment in the text of the policy for CP12: "For transitional sites that were brought prior to October 2008 all developments that are residential and mixed use will be required to provide 20% affordable housing where 15 or more residential units are being sought, where viability can be demonstrated" • It is accepted that higher affordable housing contributions can be sought from sites that are brought in today's market of lower land prices, however we do consider that the proposed thresholds outlined in Policy CP12 are too onerous and will actively discourage investment and developments from being brought forward, which can only go to prolong the economic depression that we are in. Therefore we consider that existing affordable housing thresholds should continue: • "For all sites brought forward after October 2008 all developments that are residential and mixed use will be required to provide at least 30% affordable housing where the number of units provided exceeds 15 or the site size is greater than 0.15ha"
	(a.)	Barton Willmore	<p>Requires 'at least' 40% of homes to be affordable. PPS3 seeks Local Development Documents to set an overall target for the amount of affordable housing to be provided not a minimum. Whilst, the identified need for affordable housing set out in the SHMA is noted, PPS3 requires the target to reflect an assessment of economic viability of land for housing in the area. This is considered especially relevant under the current economic circumstances. It should be noted that the SHMA identifies a considerable future demand for market housing (paragraph S49 refers). Policy CP12 should be reviewed in light of setting a target for affordable housing based on the current background evidence on viability.</p>
	(a.)	Blackwater Valley Friends of the Earth	<p>Target for affordable housing should be a minimum of 50%. Affordable housing is at a premium in GBC. Affordable housing consumes far less land and also once occupied uses up less resources.</p>
	(a.)	Carter Planning Limited	<p>No. The Proposed Policy is too onerous, inflexible and not justified.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	CPRE Surrey Branch Guildford	Considers this policy much more acceptable than the first version drafted for the Preferred Options document (CP8). Since the occupancy rate of affordable housing is usually higher than for market housing, this will have to be taken into account when educational infrastructure is being considered. Notes the overwhelming public support for more affordable housing being provided but not at the expense of the countryside or Green Belt.
	(a.)	Cranleigh Road Area Residents Association	Para.1 – the arithmetic is unclear. 40% affordable homes of an annual target of 422 homes suggests 169 new affordable homes p.a., not 129. Para.2 – meaning of clause “rising to at least 40% of the total number of homes two years after adoption” is unclear. Para.5 – the policy for funding affordable homes is unclear. Whereas the policy statement refers to 60% being socially rented, para. 9.78 suggests that 100% needs to be socially rented.
	(a.)	Crownhall Estates	By increasing the % from 35 to 40% and by lowering the threshold, all you will achieve is a reduction in speculative development borne out of a high tax take through infrastructure levy allied to a very high affordable percentage. People will refurbish their premises and maintain the current use rather than pay an over the top punitive tax. A 35% take and a 10 unit threshold would be feasible this is not. Approach is fundamentally flawed; this will reduce development and in turn the S106 provision of affordable housing.
	(a.)	Effingham Parish Council	In view of the urgent need for affordable housing, particularly in rural areas which are likely to have smaller development proposals, the Parish Council believes this section of CP12 should be strengthened. All developments of 2 or more homes should be required to contribute at a rate of 40% affordable, with financial contributions accepted for developments which are too small to allow building affordable homes on site. This would deter developers from putting in applications for 4 homes on a site which would in fact accommodate 5 or more. Objects to the proposal to phase in the requirement over two years. Given the length of time before these policies will be adopted, landowners already have sufficient notice of the 40% requirement, and 40% should be the requirement immediately the Core Strategy is adopted for all developments of 2 or more homes, not just those of 15 or more.
	(a.)	Guildford Business Forum	Supports the increased provision of affordable housing in the borough. This offers a greater likelihood that there might be sufficient provision of housing, particularly affordable housing, employees of businesses in the Borough. It is right that the Council seeks to provide affordable housing through the planning system, and it is essential in order to achieve a balanced and cohesive community and to support business. We support the onsite provision of affordable housing and that this provision is fully integrated within the development. The Council should work imaginatively with developers, housing associations and others, including GBF, to deliver affordable housing in the right locations.
	(a.)	Guildford Cathedral	The dean and chapter strongly support policies that provide more affordable housing in the borough. The dean and chapter support the lowering of thresholds for affordable housing provision. We also support the increase in percentage of affordable housing provision from 30 to 40%. The council should work imaginatively with developers/HA etc to deliver affordable housing in the right locations. The dean and chapter support the councils approach of seeking affordable housing from non-residential development of net additional floor space of 1000sqm+. The dean and chapter support more housing for key workers and request that the key worker definition is expanded.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Constituency Labour Party	<p>In the 2nd para change “between 5 & 14” to “between 2 & 14”.</p> <p>The Affordable Housing Viability study, referred to on P 69 points out that sites of between 1 & 4 houses contribute significantly to the Borough’s housing supply. It follows that not requiring these sites to contribute their 40% quota to affordable housing will significantly reduce the number of affordable homes that can be obtained.</p> <p>Para 9.76 points out the very high need for affordable housing in Guildford.</p> <p>With this high need for affordable housing, the Borough needs to maximise the affordable housing provided.</p>
	(a.)	Guildford Society	<p>Unwise to specify a % for the provision of affordable housing. It would be better to relate to the Housing Needs Assessment, as suggested in para 20.9 of the London Fringe chapter of the SEP.</p> <p>Para 5 delete reference to the current tenure split 60% social rented and 40% other. This is not a matter for the planning process to determine.</p> <p>Delete or replace para 6. Policy is far too long winded providing too many loopholes for developers to avoid direct on-site provision of affordable housing.</p> <p>Para 7 – Why is the arbitrary figure of 1000m2 identified? Omit the phrase “of net additional floor space of 1,000m2 and above”? Let planning officers negotiate inclusion on a case by case basis. How would “the average number of employees likely to need affordable housing” be calculated? Delete sentence?</p> <p>Para 8 – How can the Council “promote” conversion and re-use within the planning process? Delete?</p> <p>Para 9 – How could this be achieved through the planning legislation framework? Delete?</p> <p>Para 9.75 – Planning legislation has no control over house prices. Delete? One could argue that if CP12 is adequately robust there is no need for much of page 66. It is a Housing Office/Department issue, not planning. What will the SCS say?</p> <p>Para 9.81 – The first sentence switches from dph to % affordable – amendment needed.</p> <p>Para 9.84 – On what basis could a Council’s challenge be founded? Reword?</p> <p><input type="checkbox"/> Para 9.87 – This is not achievable through the planning legislation framework. Delete?</p>
	(a.)	Howard Hutton & Associates	<p>No - Affordable housing should be sought for residential schemes only on schemes proposing a minimum of 10 dwellings. (Cont'd) Affordable housing contributions on schemes smaller than this may adversely affect their financial viability and act as a disincentive to development.</p> <p>Action: Amend policy threshold for requiring affordable housing to 10 dwellings.</p>
	(a.)	Kaye Edwards	<p>Pleased to see that in CP12 there as been an extension of the requirement for affordable homes on all sites between 5 & 14 homes of 20% and the appropriate rise to 40% two years after adoption plus 15 and above to 40%. Only concern is that due to market conditions the supply of affordable homes under section 106 will be severely limited for the foreseeable future.</p> <p>RSL’s are looking to purchase land within the borough to provide 100% affordable schemes giving the borough nomination rights to the homes developed. The one thing that makes a lot of these schemes non-viable is the S106 costs attributed to these schemes. A number of other boroughs do not charge S106 costs on 100% affordable schemes and I ask that this point is given serious consideration to enable the supply of much need affordable homes. The same applies to Rural Affordable Homes.</p>
	(a.)	Kingstons	<p>The target of 40% affordable runs a great risk of limiting the supply of housing in favour of alternative uses OR retention of existing older run down buildings which may not maximise land use.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Lacey Simmons	<ul style="list-style-type: none"> • The current basis for provision is contained in the Council's Infrastructure SPD (2006), which states that the Council will normally request 35% affordable housing. Given today's exceptionally poor market conditions it is considered poor policy to further increase the burden on developers, The increase in thresholds and percentage of provision (developments of between 5 and 14 units are to provide 20% affordable housing in the first two years after adoption, rising to 40% after this time and those developments of 15 or more units will have to provide for 40% from the outset) will further inhibit the provision of any kind of housing in the Borough. • We therefore question the evidence base on which assumptions have been made and the policy formulated, it is considered that if research was undertaken in today's current market conditions (so during 2009, not a year ago as stated in paragraph 9.80 of the Strategy) the conclusions reached would likely to be very different • The council should be aware that the affordable housing targets means some developments will be undeliverable and so no development will take place at all which will impact on housing figures. * Policies need to be flexible to take into account the current drop in land prices compared to their previous prices, which means many developments are not unviable. • With this in mind it is considered that greater emphasis in Policy CP12 needs to be given to the issue of viability. It is considered that the economic data on which Policy CP12 was formulated on (circa April 2008) is out of date, thus hindering a informed assessment of economic viability in today's climate. • Respondent makes suggestion to an amendment in the text of the policy for CP12: "For transitional sites that were brought prior to October 2008 all developments that are residential and mixed use will be required to provide 20% affordable housing where 15 or more residential units are being sought, where viability can be demonstrated" • It is accepted that higher affordable housing contributions can be sought from sites that are brought in today's market of lower land prices, however we do consider that the proposed thresholds outlined in Policy CP12 are too onerous and will actively discourage investment and developments from being brought forward, which can only go to prolong the economic depression that we are in. Therefore we consider that existing affordable housing thresholds should continue: • "For all sites brought forward after October 2008 all developments that are residential and mixed use will be required to provide at least 30% affordable housing where the number of units provided exceeds 15 or the site size is greater than 0.15ha"
	(a.)	Member of the public	Agree with the approach
	(a.)	Radian	The principle of seeking greater levels of affordable housing by reducing the thresholds and increased the proportions of affordable housing is supported, particularly if this policy approach is supported by a robust viability study.
	(a.)	SEEDA	Considers that the approach to affordable housing is acceptable, allows sufficient flexibility and complements RES target 9 (physical devt)

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Solum Regeneration Partnership	<p>Object - The requirement for affordable housing from non-residential developments greater than 1000m2 is not directly related to the proposed developments, is not fair or reasonable and is not required to make the proposal acceptable in planning terms (paragraph B.9, B.15 Circular 05/2005).</p> <p>Many of the workers may originate from outside the borough and therefore the contribution is not related to the development as sought by Circular 05/2005. It is also not reasonable to seek this contribution, particularly due to the current economic climate. It will also deter businesses from moving to Guildford or expanding which is contrary to the objective of policies CP1 and CP3.</p> <p>Object to the wording "at least" 40% affordable housing. The emerging South East Plan does not include the words at least and therefore this should be deleted.</p> <p>Object to the second paragraph "40% of the total number of homes two years after adoption" as the justification is not clear. Also the meaning is not clear - does 'adoption' this refer to the adoption of the Core Strategy? LDF? SPD?</p>
	(a.)	Surrey County Council	<p>Note the (corrected) policy wording. SUPPORT the Borough's sliding scale referring to some 20% of units to be provided as affordable units from smaller schemes between 5-14 units for the first two years after adoption (rising to 40% thereafter), and for 40% affordability from larger schemes (15+ units). Accept that this approach is reasonably compliant with the policy approach of the South-East Plan and that some consideration is given to the current and likely short future economic situation.</p> <p>Would SUPPORT a policy that requires ensuring educational infrastructure is provided by developers, as in Policy CP5. It is most important that affordable housing also attracts a S.106 education contribution.</p>
	(a.)	University of Surrey	<p>Strongly supports the increased provision of affordable housing in the borough. These provide a greater likelihood that there might be sufficient provision of housing, particularly affordable housing, for its staff, students, and the employees of tenants of the Surrey Research Park. Supports the lowering of thresholds for affordable housing provision, which should help to increase its supply. Support the onsite provision of affordable housing and that this provision is fully integrated within the development. Whilst the University of Surrey supports the Council's approach of seeking affordable housing from non-residential development of net additional floor space of 1000 sqm and above (including change of use) which create additional affordable housing need in the borough, it should be made clear that this relates to commercial businesses and does not affect the University's activities. There should not be a requirement placed upon it to provide further affordable housing in addition to this.</p> <p>Recognition should also be given to the need for more student housing. The University considers that student housing is a form of affordable housing that is not currently given adequate consideration in planning policy. The demand for student housing is increasing as the number of students increases. It is possible that other providers of purpose built and managed student accommodation might seek to provide for additional student housing in the town.</p>
	(a.)	Vail Williams	<p>Affordable housing contributions should not be sought from non-residential development. Such an approach may detract companies from growing or relocating into the Borough.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Westborough, Broadacres & District Residents Association	<p>No definition of an Affordable Home is supplied so does anyone actually know what an affordable home actually is? What does it or should it cost? The Policy mentions a mix of 60% social rented and 40% of other forms. This type of social engineering is simply untenable. Residents' Association has vigorously opposed many Housing Conversion & Extension applications which on the face of it seem affordable or at least lower than average cost but in the end, the Planning Committee plays party politics and it all goes to Student Lets. The developers/landlords pay no Council Tax and just cause abject misery and stress in the neighbourhoods which were once quiet family house roads – roads where houses are now poorly maintained student accommodation awash with cars, noise and thoroughly unpleasant places to live. As long as Guildford is a University Town and the Council Planners fail to see developments for what they really are, there will always be a shortage of decent family housing and lower-cost housing too.</p>
	(a.)	Woolf Bond Planning on behalf Martin Grant Homes Ltd	<ul style="list-style-type: none"> • Affordable housing targets should be based on an up to date assessment of need. However, the levels of affordable housing provision should be realistic in terms of ensuring that developments remain viable. • The level of affordable housing to be provided as part of a housing scheme should also take into account the level of S.106 contributions sought. • An unrealistic affordable housing threshold/ target could prevent otherwise suitable sites from being brought forward and could impact upon the overall levels of housing land supply. • The strategy proposed by the Local Authority in seeking to rely on, for the most part, previously developed sites to meet the overall housing requirement has obvious implications for the delivery of affordable housing. • This problem is normally less pronounced with greenfield urban extensions subject to the infrastructure requirements associated with the same. Greenfield sites are more often of a suitable scale to deliver a material amount of affordable housing.
	(b.)	Guildford Business Forum	<p>GBF supports the lowering of thresholds for affordable housing provision, which should help to increase its supply. However we consider that the suggestion that the Council will require all residential....including two or more homes(gross) to provided at least 40% of homes as affordable to be draconian. Propose that the requirement should be Net rather than gross- otherwise runs the risk of losing windfall sites where the proposal is for demolition of an existing dwelling to permit construction of two dwellings. Also the final Regional Spatial Strategy for the South East published today recommends 35% affordable rather than the 40% the Council proposes.</p> <p>Whilst GBF supports the Council's approach of seeking an affordable housing contribution from non-residential development of net additional floor space of 1000 sqm and above (including change of use) which create additional affordable housing need in the borough, it should be made clear that this relates to commercial business development rather than for example development by and to serve the requirements of service providers within the Borough.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(b.)	Home Builders Federation	<p>The Council states that it will seek to facilitate provision of 129 affordable dwellings per year “from all sources”. This is not the same as seeking 40% of all new dwellings to be affordable housing provision.</p> <p>The Council uses gross figures to establish thresholds yet such an approach is clearly inequitable. The Council’s targets should apply to net additions rather than gross development.</p> <p>The Council appear to be seeking to tax the profit from development rather than merely provide for mixed and balanced communities. This is demonstrated by the fact that off site provision of affordable housing is required to be “financially neutral” to the developer who will “benefit from more market housing” (para 9.83).</p> <p>The Council has not explained why the proposed requirement on smaller sites increases from 20% to 40% 2 years after adoption of the plan. Council commended for recognising the impact of its increasing demands on developers and that this will take time to be reflected in land prices and viabilities. Phased implementation of increasing requirements should be stressed within the policy.</p> <p>The policy should be amended to reflect the phased implementation of the Council’s increased affordable housing requirements over the 2 years after adoption of the Core Strategy on all sites.</p> <p>If a site is unsuitable for affordable housing provision then affordable housing “requirement” cannot be held to be directly related to the development itself. There is no direct relationship between the development and the provision of affordable housing. It is only where the requirement is established on site but that for other reasons (management being the most obvious example) off site provision is a better solution to provision of affordable housing within an area. Council is reminded that planning obligations should not be used merely to secure a share of the profits of development.</p> <p>The Council needs to give considerably more thought to the impact of their policy requirements on small sites and the off site provision of commuted sums towards off site provision of affordable housing. This problem can be avoided through the adoption of a higher threshold – hence the national guidance threshold of 15 dwellings which clearly avoids having to address this problem.</p>
	(b.)	Radian	<p>It is not clear within the core strategy document what the current policy regarding affordable housing is. The “Update since preferred option consultation context” suggests that the current policy requires affordable housing from all developments of at least 2 homes. The Core Strategy text in the shaded box suggests that the threshold is 5 homes.</p>
	(b.)	Vail Williams	<p>The provision of additional essential worker accommodation is supported.</p> <p>The Trust objects to the requirement for all non-residential development of net additional floor space of 1,000 sq.m to provide a financial contribution towards affordable housing. The spirit of the policy would apply to the Trust which already provides essential worker accommodation. The Trust should not be expected to provide affordable housing contributions as a result of new developments as it provides a community facility. This policy needs further review as non-residential development could also apply to other major employers and facilities within the Town such as the University and the Surrey Research Park which should not be the case.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(c.)	Barton Willmore	<p>Policy CP12 requires “at least” 40% of homes to be affordable. It is not clear whether the amount; thresholds; and mix proposed regarding affordable housing provision is fully justified by the Council’s evidence.</p> <p>In this respect, we have reviewed the Council’s Viability Report (2008) which states that the Council should seek to establish a requirement for 40% affordable housing but with scope for negotiating lower levels of provision (Paragraph 5.1). There does not appear to be any indication within the report’s recommendations that this requirement should be treated as a minimum and our reading of the report’s recommendations is that 40% should be treated as an ‘upper limit’ taking into account economic viability of development.</p> <p>We note that the Council has commissioned a recent update (February 2009) to the original viability study to assess the report’s findings in light of current economic conditions. This asserts the recommendations of the 2008 report remain broadly valid but that the Council should adopt “flexibility in its approach” (page 43). Our understanding is that the update report advocates even greater flexibility in the level of affordable housing required, taking into account the increased uncertainty regarding the impact upon viability a 40% requirement may have.</p>
	(c.)	Carter Planning Limited	Yes
	(c.)	Guildford Society	<p>The table on pages 121 and 122 of the Consultation states which Local Plan policies it is intended to replace with Core Strategy core policies. □</p> <p>H11: Affordable Housing. Replaced by CP12: Affordable Homes. The 30% requirement is raised to 40%. The threshold is lowered from 15 to 5 homes. Some flexibility is allowed in both H11 and CP12, though in CP12 it is limited to considerations of viability. There is an obvious danger that CP12 and CP20 taken together will price out the development of small sites.</p>
	(c.)	Howard Hutton & Associates	<p>Did the Council’s viability check on reducing the threshold for affordable housing include the financial burdens of Policy CP20 requiring new residential units to achieve Code for Sustainable Homes Level 4; the financial requirements of the Infrastructure SPD; and the potential future demands of the Community Infrastructure Levy? If so, please provide a copy of the report for comment.</p>
	(c.)	King Sturge LLP	<p>Development viability is welcome, as this is a central feature of Planning Policy Statement 3 “Affordable Housing”. However, the requirement for affordable housing to be provided by non-residential developments is not supported by national planning policy guidance. PPS3 “Housing” provides guidance on the provision of housing of affordable tenures, and makes no reference to a framework whereby this can be sought as part of commercial / retail / community developments on this matter. Indeed, PPS3 clearly does not support this as it provides no reference to any site size threshold for the provision of affordable housing as part of non-residential development. This makes the proposed 10,000m2 figure within draft policy entirely unjustified, being based on no sound policy or viability rationale.</p>
	(c.)	Radian	<p>In regards to the national and regional policy context, there is no mention of Lifetime Homes, Lifetime Neighbourhoods, Planning Policy Statement 3 and the South East Regional Housing Strategy. It is also not clear whether Guildford has an adopted Housing Strategy, and if so, how this has fed into the formation of the Core Strategy. However the thrust of seeking greater affordable housing through the planning policy process reflects the national agenda.</p> <p>Although there is mention of empty homes in the borough there is no detail regarding what the Council has previously done to bring empty homes back into use.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(c.)	Surrey Community Action	The tenure split between social rented and other forms of affordable housing reflects the fact that for many households in housing need, social rented housing is the most appropriate form of tenure, and is thus an appropriate policy. This is the case in rural areas where local parish housing needs surveys have shown that the standard share of shared equity products is often too high for most local households, and the majority of rural households in need thus benefit from social rented accommodation.
	(c.)	The Planning Bureau Ltd.	Not consistent with PPS3 in respect to the circumstances in which an off site contribution may be acceptable. PPS3 does not provide specific circumstances whereby an off site contribution would be justified, neither does it state it should only be sought on very small sites. The Council's policy is too prescriptive on when an off site contribution may be acceptable. Certainly, with sheltered accommodation because of the additional levels of communal facilities and services charges associated with it is not possible to mix affordable housing within the same block and RSL's will not take on dispersed units in a scheme under a differing service charge structure. In those circumstances where it would not result in a successful housing development scope must be had for an off site contribution. PPS3 allows for that but Policy CS12 is far too prescriptive and draws conclusions that are not present in PPS3. It is therefore not consistent with national planning policy guidance in respect to off site contributions. Similarly, it is considered that the Councils' term 'financially neutral' in terms of the level of off site contribution is ambiguous. Paragraph 29 of PPS3 advises that any off site contribution should be broadly equivalent to the provision that would have been expected to be provided on site. As worded the policy in this respect is ambiguous and should be amended to be consistent with PPS3 to read that 'Any off site contribution or payment must be broadly equivalent to the value of provision should the level of affordable units sought been delivered on site.'
	(c.)	The Planning Bureau Ltd.	Paragraph 9.83 - Please see my comment in regard to Policy CS12. In summary the wording of the paragraph should reflect the wording within PPS3 Paragraph 29 to be consistent. This makes reference to the principle of broad equivalence for off site contribution. The Council's term 'financial neutral' is ambiguous as it does not clarify that the Council are not seeking a level of contribution above and beyond the cost of what it would be to deliver the same amount of units on site. Again, to be consistent with PPS3 'financial neutral' should be replaced with broadly equivalent.
	(c.)	The Planning Bureau Ltd.	Paragraph 9.86 - Client strongly objects to the wording of this paragraph. It does accept that certain forms of sheltered accommodation are not exempt from the provision of affordable housing. It also accepts that dialogue with the Council's housing officers would be beneficial so that the provision of affordable housing could be most appropriately delivered. However, it would be unreasonable to insist upon the delivery of other forms of affordable housing provision on site if the result is that it would not result in a successful sheltered or extra care housing scheme being developed.
	(d.)	Carter Planning Limited	The Proposed Policy does not refer to key worker housing
	(d.)	East Horsley Parish Council	To insist that a development of as few as two homes should include one affordable home in areas where the prevailing dwelling size is 3, 4, or 5 bedrooms will be damaging to street scenes and neighbourhood characteristics, and will create the very pockets of deprivation the Borough Council is supposedly committed to ending. Any stipulation of minimum household density should be subject to the availability of sufficient local infrastructure able to absorb the extra households involved.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	King Sturge LLP	<p>Requiring affordable housing contributions from non-residential development is unworkable. There is no planning mechanism which exists to calculate the average number of employees within new non-residential floorspace likely to require affordable housing. Any calculation would therefore be based upon general trends, contravening the principle that each application must be considered on its own merits. Where any employees of a development do utilise affordable housing, it would be necessary to establish whether this results in additional housing need, i.e. the employee may already live in the borough and therefore not be creating additional housing demand. For this reason this element of policy CP12 should not be pursued.</p>
	(d.)	Member of the public	<p>Object, subpara 2 “- including 2 or more homes (gross) - “. Is this intended?</p>
	(d.)	Radian	<p>The Core Strategy documents only set out broad policies regarding policy principles, withstanding this, the detail regarding affordable housing in CP12 is very vague. Examples are as follows:</p> <ul style="list-style-type: none"> •Affordable housing will be sought from non-residential developments of net additional floor spaces of 1,000m2 however there is no detail as to methodology as to how this will be negotiated and how it will be calculated how many employees will need affordable housing. •The principle of off site provision or a commuted payment in lieu is fine however more detail needs to be included which sets out a basis for undertaking a viability study to independently assessing whether or not this is appropriate. More detail needs to be included which sets out how commuted sum payments will be spent. •Details also need to be provided regarding Guildford BC’s approach to delivering affordable housing through s106s and if for example private developers will be expected to give affordable housing providers free-serviced land. <p>If the above is not set out within the Core Strategy then the subsequent Infrastructure SPD will need to be very detailed specifically in relation to affordable housing delivery through the planning process.</p> <p>It is not clear from the policy whether Guildford BC are seeking the affordable housing to generally reflect the type and size of private housing. It would be undesirable to end up with large family private housing and lots of small one bedroom affordable flats.</p> <p>It is not clear whether there will be a policy regarding key workers. The term key worker is unhelpful particularly if applied as an occupation restriction on affordable housing. The preference would be to develop a clear policy around intermediate homes and whom this will be targeted out and how the planning policy will relate to Choice Based Lettings (the housing allocation policy). Intermediate housing can make a positive contribution to balanced communities and ensuring people who are essential to the local infrastructure can remain in the area.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	SHMA was apparently not available at the time of the publication of the Core Strategy, the authors must however have been aware of its contents as they have selectively quoted from it in paragraph 9.76 (page 66). Authors seem to have ignored the need for market housing identified in the study. Affordable housing mentioned in (paragraph 9.80, page 67), but no reference to market housing provision. Referenced PPS3 – Housing (November 2006), Paragraph 2. This does not distinguish between market and affordable housing. Strategic objective MSG5 by the Strategy's own admission will fail. SHMA referenced in detail and evidenced examined. Council could not be unaware of this for the Core Strategy. There appears to be nothing in the Core Strategy which will specifically address this issue that Guildford's large student population means that demand for private rental sector properties usually outstrips supply. The Strategy will do little to address this issue in that it is looking primarily for housing to be supplied within the town centre, which is characterised by higher density flatted development. Evidence only taken from one document. PPS12 referenced. The whole approach to Theme 2 is fundamentally flawed. The requirement for additional housing provision has moreover been noted for some time and the potential solutions identified. The Panel Report on the Draft South East Plan referenced about changes to the greenbelt boundary and Guildford identified as having more potential for sustainable growth. The Strategy fails to take on board a technical assessment of the sustainability advantages and disadvantages of accommodating some new housing on Green Belt land.
	(d.)	The Clandon Society	Believes that Affordable homes should be classed as local housing for local people. Want their two villages to have a mix of houses and that these should not be socially engineered, but available for local people with needs and not for students or those wishing to commute to London. Green Belt should not be sacrificed for this type of accommodation, but small areas allocated from brown field sites.
	(e.)	Carter Planning Limited	Yes. The % element is too high and will unachievable. The threshold is too low and will make provision/development uneconomic. The % split between rented and shared equity is too prescriptive. The Proposed Policy should allow for payments in lieu or other methods of provision than on site generally as an alternative and not as an exception as it will not always be appropriate to provide on site. The Proposed Policy should not extend to commercial development.
	(e.)	Guildford Environmental Forum	Affordable housing: Suggest a change to: "Affordable housing will be sought from non-residential developments of net additional floor space of 500 m2 and above".
	(e.)	Howard Hutton & Associates	Amend policy threshold for requiring affordable housing to 10 dwellings.
	(e.)	Jencar Engineering	Page 67 'no' should be 'not' at end of paragraph (9.86)
	(e.)	Member of the public	9.74 Need A definition of Intermediate Housing would be helpful either in the text or in the Annex II Glossary 9.89 update since Preferred Options consultation Bullet Point 5 Should this read "at least 5 homes" or should policy CP12 paragraph 2 read "between 2 and 14 homes"?
	(e.)	Member of the public	Page 65: the target for "affordable" homes is set at 40% of new homes and it states that this amounts to 129 affordable houses a year. 129 is 40% of 322. The Core Strategy states earlier that, although GBC does not agree with the higher housing target of 422 a year, it has no option but to base its strategy on the Secretary of State's higher (minimum) target. The Core Strategy must therefore make it clear whether the target is 129 affordable homes p.a. or the much higher figure of 40% of new homes, which would mean 169 affordable homes p.a. (i.e. 40% of 422).

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Ockham Parish Council	Para. 2 - we did not understand "two years after adoption". Adoption of what, please? 9.83 line 5 "of is"?! Omit "of"?
	(e.)	Radian	9.83 – line 5: delete of 9.86 – line 8: no should be replaced with not 9.87 – line 5: The Housing Corporation no longer exists (it has been replaced by the Homes and Communities Agency and the Tenants Services Authority) “Summary of Interim Sustainability Appraisal Findings” – line 2: delete the
	(e.)	Surrey County Council	Para. 9.85. In our view, the cumulative impact of affordable housing on educational infrastructure must be mitigated. The occupancy of affordable housing is typically higher than market housing, and therefore it is all the more important that its effect on educational infrastructure is mitigated. □ Para. 9.87. SUPPORT the policy of provision of affordable housing on-site as it will contribute towards community cohesion.
CP13	(a.)	CPRE Surrey Branch Guildford	Agrees with this policy provided it is for small scale development of 100% affordable housing comprising only a few units located on accessible sites to meet local needs.
	(a.)	Downsedge Residents' Association	Text in box and paragraphs 9.90-9.92. No comment.
	(a.)	Effingham Parish Council	SUPPORTS this.
	(a.)	Guildford Business Forum	Supports this policy which will assist with meeting housing need in rural communities.
	(a.)	Guildford Cathedral	The dean and chapter strongly support this policy
	(a.)	Guildford Constituency Labour Party	The policy states that exception sites for affordable housing will be for “local needs within the parish or settlement”. Suggest change “within the parish or settlement” to “within Guildford”. Para 2.9 lists as one of the key issues for Guildford is to “work to ensure a socially inclusive borough, with equal opportunity and access to all” Guildford’s villages should be as open to those needing affordable housing as are its urban areas. This is clearly not the case at present, especially in the villages with the loss of affordable housing. Indeed, the Vision (Para 4.1) says “housing will include more affordable homes particularly in rural areas. Restricting provision of affordable housing solely to needs within the parish concerned will do little to achieve this objective.
	(a.)	Member of the public	The combined meaning of CP13 and para 9.90, especially the last sentence relating to East Horsley and Send is not clear. Could it be stated clearly what is allowed and what is not. As regards Send not being designated as a "rural area" it is difficult to see how such a judgment could be made. It should not be the case that it should be selected for further development because there is nothing much in the village to spoil.
	(a.)	Member of the public	Site 101 on the Site Allocations Consultation Paper that the site be considered for (inter alia) Affordable Housing. Discussed with a member of the Planning Department the proposed widening of the criteria for affordable housing under draft CP 13. Shackleford Village would not be a "designated village". Suggests that greater flexibility would be achieved by not limiting the Policy to a " defined rural settlement..." but to "any rural settlement...". Site 101 to be included in the allocated sites for further consideration
	(a.)	Member of the public	Rural regeneration is vitally important to protect our villages from decay and/or over population of the "wealthy" and very often, older property owners with grown up families.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	National Trust	Supports the provision of affordable housing to meet local needs within villages in rural areas. However development adjoining or in close proximity to settlements, ie greenfield development, should only take place where there is no adverse impact on either the settlement itself, including its setting, or the surrounding rural area. This is implied in the supporting text to Policy CP13 but needs to be explicitly stated as a criterion in the Policy itself.
	(a.)	Shalford Parish Council	Shalford PC is particularly pleased to note that 'consideration will be given to the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection... (para. 9.91)
	(a.)	Surrey County Council	NOTE the reference to exceptional cases for the provision of 100% affordable housing for local needs to be permitted on allocated and unallocated sites that adjoin or are suitably related to identified rural settlement boundaries. Note the exclusion of East Horsley and Send villages for the reasons stated and also note that affordable housing will be sought generally within these localities. Such exception schemes should be mostly small scale and comprising a few units located on accessible sites. Would SUPPORT a policy that seeks to limit schemes to those of a small scale responding to local housing needs.
	(a.)	Thames Valley Housing Association	Pleased to see that in CP12 there has been an extension of the requirement for affordable homes on all sites between 5 & 14 homes of 20% and the appropriate rise to 40% two years after adoption plus 15 and above to 40%. Only concern is that due to market conditions the supply of affordable homes under section 106 will be severely limited for the foreseeable future. RSL's are looking to purchase land within the borough to provide 100% affordable schemes giving the borough nomination rights to the homes developed. The one thing that makes a lot of these schemes non-viable is the S106 costs attributed to these schemes. A number of other boroughs do not charge S106 costs on 100% affordable schemes and I ask that this point is given serious consideration to enable the supply of much need affordable homes. The same applies to Rural Affordable Homes.
	(a.)	University of Surrey	Supports this policy which will assist with meeting housing need in rural communities.
	(b.)	Tribal MJP	Policy is not flexible in terms of developing suitable sites that have not been previously identified as a rural settlement. It therefore ignores potential sites that might arise as result of being surplus to requirements and relies on the councils awareness of all such sites.
	(d.)	Crownhall Estates	Look at a S106. They all have mortgagor 'step in' rights which fundamentally preclude all affordable housing from 'guaranteeing' affordability in perpetuity. See para 9.90. No lender will advance to an RSL without these provisions.
	(d.)	Environment Agency	Policy appears to override considerations such as flood risk and nature conservation when deciding on the location of development in certain rural areas. Seeks clarification as to the use of this policy when it conflicts with, for example policy CP22.
	(d.)	Member of the public	The area at the top of Send Hill is between 2 public footpaths. A traveller site here would effectively close these footpaths as people would feel threatened using them.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Surrey Community Action	The policy will help enable the provision of affordable homes for local people across the rural areas, and importantly emphasises that sites may not directly adjoin the settlement boundary, ensuring flexibility to meet the local needs where sites adjacent to settlements cannot be identified. It is crucial that these sites can come forward both as allocated sites and unallocated sites, using a twin-track approach, so as to ensure that ad-hoc rural exception sites can continue to come forward, but the inclusion of an allocations policy through the Site Allocations DPD could be useful in meeting specific identified needs. Housing type and size to meet local housing needs in settlements can be usefully identified by 'parish housing need surveys' in the settlements, not solely though the data collected by the SHMA, as community needs will differ across settlements and across time.
	(e.)	Member of the public	Target: 'To assist the delivery of affordable housing for local people through rural exception sites where appropriate and where there is an identified need.' Should read ...'where there is an identified need for people who work in rural areas'. There is no good reason to build homes in rural areas if the only reasonable way to get to essential services/shops is by car.
	(e.)	Ockham Parish Council	9.90 - suggest amend pre-penultimate line to read: "...Enfranchise, and so in these villages it is not possible to guarantee that housing, which initially is provided as affordable housing, will remain affordable housing in perpetuity."
CP14	(a.)	CPRE Surrey Branch Guildford	Has experienced some difficulty with illegal incursions onto protected countryside at Chobham, Effingham and West Horsley. Recognises that additional pitches are necessary across the county, great care will have to be exercised in their selection to avoid conflict with local gypsy families established over many years in housing who do not want nomadic newcomers located nearby. The movement of gypsies from Ireland and parts of Eastern Europe could become a problem for local authorities. Only in very special circumstances should Green Belt be selected.
	(a.)	Downsedge Residents' Association	Text in box, In the first paragraph remove reference to the South East Plan. In the second paragraph we do not think that the sequential approach is sensible [see paragraph 1/15 of these comments]. Is not "outskirts of urban settlements" in the first bullet point in conflict with CP 27, paragraph 9.166? Paragraphs 9.93-9.95. (a) In 9.93 remove reference to South East Plan. Otherwise these paragraphs are acceptable.
	(a.)	Effingham Parish Council	Strongly supports the principle that all alternative sites will be explored before Green Belt sites are considered. In both the Site Allocations DPD and in any planning application, evidence should be clearly presented to show that this has been done. Policy H15 covering Home Farm is to be reviewed and replaced during the Framework process. In view of its importance to Effingham, the Parish Council must be consulted when H15 is reviewed.
	(a.)	Guildford Business Forum	Supports this policy and the provision of sufficient sites for "travellers" by both public and private means. However such provision must be in conformity with planning policies for housing. The provision of such sites must be seen by the public as being equitable and within the law.
	(a.)	Guildford Cathedral	The dean and chapter support this policy and the provision of sufficient sites for "travellers" by both public/private means. Such provisions must be in conformity with the planning policies for housing. The provision of such sites must be seen by the public as being equitable and within the law.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Surrey County Council	SUPPORT the approach to the identification of sites through the Sites Allocations DPD to meet the Borough's allocation for gypsies and travellers arising from the Partial Review of the South-East Plan. Suggests that cases of genuine need should be allowed for when considering development including private applications.
	(a.)	University of Surrey	Supports this policy and the provision of sufficient sites for "travellers" by both public and private means. However such provision must be in conformity with planning policies for housing. The provision of such sites must be seen by the public as being equitable and within the law.
	(b.)	Environment Agency	Sites for temporary or mobile homes are particularly susceptible to flooding, and should not be located in areas at risk from flooding.
	(d.)	East Horsley Parish Council	Developments of Gypsy and Traveller accommodation should not be permitted as a means of satisfying government targets when the necessary infrastructure - schools, medical services, other local amenities - cannot cope. GBC must not 'zone' areas as suitable for mobile Gypsy/Traveller sites based wholly or partly on assumptions about the ethnic extraction and lifestyle preferences of nearby residents. This constitutes racial and ethnic discrimination and is illegal.
	(d.)	Member of the public	If Romany Gypsies are an ethnic minority is it right that Irish Travellers be regarded similarly and Travelling Showpeople excluded? Surely the Irish Government should have some responsibility for their own nationals abroad. There seem to have been at least four documents produced for the SE England Regional Assembly on Gypsies, Travellers and Travelling Showpeople. These studies give very serious, proper and detailed consideration of the requirements of and for these groups but do not call for any commitments on their part. Surely it would not be unreasonable and only fair for all concerned to stipulate that wherever they stay for whatever period a. They should not occupy land without permission b. Should respect boundary fences and hedges c. Dispose of their own refuse in the appropriate place without leaving it behind them for others or the local council to clear d. Generally respect the location and other people e. In this way live by the same rules that we all observe. Need to Establish a few ground rules.
	(d.)	Member of the public	If Romany Gypsies are an ethnic minority is it right that Irish Travellers be regarded similarly and Travelling Showpeople excluded. Irish Government should have some responsibility for them. There seem to have been already documents prepared for the South East England Regional Assembly on Gypsies, Travellers and Travelling Showpeople. These studies give very serious, proper and detailed consideration of the requirements of and for these groups but do not set out any obligations or commitments required on THEIR part wherever they are located. Why do we have to accommodate them and destroy our green belt.
	(d.)	Worplesdon Parish Council	The following statement appears to have been omitted from Policy CP14. "Very special circumstances have to be demonstrated before Green Belt sites will be considered."
CP15	(a.)	CPRE Surrey Branch Guildford	No further comment to make.
	(a.)	Downsedge Residents' Association	Text in box. (a), (e) Our comments in 11/94 apply here also. Paragraph 9.96.(a) Remove reference to South East Plan. Otherwise acceptable.
	(a.)	Effingham Parish Council	No comment

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Business Forum	Support this policy and the provision of sufficient sites for "travellers" by both public and private means. However such provision must be in conformity with planning policies for housing. The provision of such sites must be seen by the public as being equitable and within the law.
	(a.)	Guildford Cathedral	The dean and chapter support this policy and the provision of sufficient sites for "travellers" by both public/private means. Such provision must be in conformity with planning policies for housing. The provision of such sites must be seen by the public as being equitable and within the law.
	(a.)	Member of the public	Disagree with the policy, which appears to assume an increase in provision is needed. This is highly questionable as this form of trading tends to be environmentally unfriendly, and its contribution to the local economy is questionable. By contrast, policy CP14 is correctly drawn more tightly, restricting new provision to cases where there is a clear need for is, and preventing provision on rural exception sites in cases of incoming Gypsies/Travellers. Policy CP15 should incorporate a similarly restrictive approach.
	(a.)	University of Surrey	Supports this policy and the provision of sufficient sites for "travellers" by both public and private means. However such provision must be in conformity with planning policies for housing. The provision of such sites must be seen by the public as being equitable and within the law.
	(d.)	Member of the public	Already documents prepared for the South East England Regional Assembly on Gypsies, Travellers and Travelling Showpeople. These studies give very serious, proper and detailed consideration of the requirements of and for these groups but do not set out any obligations or commitments required on THEIR part wherever they are located Disputes between this group and established residents are a known problem caused in great part by the attitudes and practices they follow
	(e.)	Guildford Environmental Forum	Suggest following 9.96 "Adequate water, toilet and waste collection facilities will be provided at Gypsy/Traveller sites". "Adequate water, toilet and waste collection facilities will be provided at sites for travelling showpeople".
CP16	(a.)	Abbotswood Residents Association	Fully support this policy. Would ask that this contains a reference to the Residential Design Guide.
	(a.)	CPRE Surrey Branch Guildford	Supports this policy. Like to see reference made in the Policy to the Guildford Borough Residential Design Guide July 2004, the GBC publication "Greening the Approaches" published in 2001, the Surrey Design Guide, and to the Building Design leaflet published by the Surrey Hills AONB Office.
	(a.)	Cranleigh Road Area Residents Association	Para.1 – as in Policy CP11 there should be explicit reference to the Residential Design Guide, e.g. "All development will.....strengthen the character and distinct identity of the area by reference to the Residential Design Guide." Furthermore, this policy highlights the importance of context, function and impact as considerations for development, but ignores the equally important aspect of amenity as covered in Policy H4 of the Local Plan, which this policy partly replaces. There should be an additional clause e.g: "Amenity – ensuring and protecting the quality of life of residents in terms of privacy, and access to sunlight and daylight."
	(a.)	Downsedge Residents' Association	Text in box and paragraphs 9.97-9.101. (a) Title could be improved but otherwise acceptable.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	East Horsley Parish Council	Endorse this policy. Although East Horsley has seen many and varied influences on its buildings in the last 400 years, future changes need to be for the cosmetic benefit of the village and its occupants. However concerned that the continued drive for larger and larger housing is unbalancing the look of the village and we support measures to retain a proportion of small dwellings.
	(a.)	GBC	The council's desire to consider design at the very earliest stage of planning is to be applauded. However, it is a shame that while the Town Centre Action Plan development has run alongside the production the core strategy the master plan for Slyfield Area Regeneration Plan has not.
	(a.)	Guildford Business Forum	Endorse this policy approach and would advocate for the need for new development to respond and embrace the existing architectural code within its immediate area in relation to the development. Feel that constraints like flood plain should act as a facilitator to design rather than an inhibitor. The Core Strategy advocates the recycling of sites and it is felt that redevelopment of existing sites within flood plains is a more sustainable approach to management of flood risks rather than the provision of use to elsewhere in the borough of less constraint and risk.
	(a.)	Guildford Cathedral	The dean and chapter support this policy
	(a.)	Guildford Society	Suggest that "Design and Layout" would be a better title. We are familiar with Bracknell Forest Borough's Core Strategy. Its CS7 and EN20 provide a useful cross check on whether CP16 covers all the key points.
	(a.)	Holy Trinity Amenity Group	Agree, except make small addition thus . "Context – the streetscape or landscape in which development is located. Good design will always address its surroundings, responding to the scale, height, plot size, character, heritage and prominent viewpoints and views in the area;" Local and street views are just as important as views seen from prominent, elevated, viewpoints, and as the viewpoints themselves.
	(a.)	National Trust	Suggest that the title of this policy is changed to 'Design'. The wording of the policy should make reference to the need for high quality, inclusive design and reflect the principles of good design as set out paras 33 to 39 of PPS1. Of particular relevance in Guildford is the need for development to be integrated into the existing urban form and the natural and built environments, respond the local context, and create or enforce local distinctiveness. The policy should also make reference to the need for planning and listed building consent applications to include high quality Design and Access statements in accordance with relevant legislation and guidance.
	(a.)	University of Surrey	Supports this policy. The University in its recent construction projects (such as the Post Graduate Medical School, Manor Park Sports Complex, Manor Park student residences, new GSA) has succeeded in building to a high standard of design. The PGMS in particular has won local awards for its design. Forthcoming construction projects including the proposal for a new Learning Resource Centre seek to maintain these high standards.
	(d.)	Member of the public	Disappointing that SPDs such as the Landscape Character Assessment and Residential Design Guide cannot be independently examined and thereby strengthened. However, they are mentioned strongly in the Core Strategy and it is essential that they are incorporated into the Local Development Framework. More emphasis could be given in the Core Strategy to Guildford's topography. Buildings need to be built that are keeping with the town's topography and views and this could be added to CP16 or CP27. More emphasis could be given to Guildford's views – into and from the town and countryside, as well as across the town and countryside. Development within the town can adversely affect the AONB and countryside. This could perhaps be added to Policy CP16 or CP27. The roofscape of Guildford, because of its topography, is very noticeable and contributes to Guildford's scenery. It needs preserving where necessary and enhancing, and this could perhaps be emphasised in Policy CP16 or CP27.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Member of the public	Under 'Context' the following would provide an extra safeguard: "Good design will always address its surroundings, responding to the scale, height, plot size, character, heritage, prominent viewpoints and views, and views which contribute to the character of Guildford.
	(e.)	Sport England	<p>Welcomes the principle of Policy CP16 and advocates the importance that high quality urban design and master planning has on the development of healthy and active communities.</p> <p>Suggests a link could be made within the policy wording and supporting text to the importance of design in the implementation of a number of relevant Core strategy policies, including: CP17 'A healthy population'; CP18 'Space to breath'; and CP 19 'Well-being, leisure and culture'</p> <p>Sport England's 'Active Design' guidance which can assist with designing developments which actively encourage sport and physical activity. The guidance uses three objectives to frame advice on positive design: improving accessibility; enhancing amenity; and increasing awareness. Using the three design objectives, the guidance explores in detail their application to three activity settings: •Everyday activity destinations (shops, homes, schools workplaces) •Informal activity and recreation (play areas, parks & gardens) •Formal sports and leisure activities (sports pitches, swimming pools etc)</p> <p>Active Design poses a number of questions for consideration by planners. Theme-Example questions were given, Accessibility (21 questions), Amenity - (12 questions) & Awareness - (13 questions)</p>
CP17	(a.)	Barton Willmore	The principle of Policy CP17 in the first paragraph of the Policy is supported. A Health Impact Assessment is not considered necessary for 'major development' when located in a sustainable location. The encouragement for the preparation of Health Impact Assessments should be limited to strategic development which may be located in more remote locations isolated from existing services and facilities i.e. Slyfield Industrial Estate. The second paragraph of Policy CP17 should be deleted alongside paragraph 9.104.
	(a.)	Carter Planning Limited	No. The Proposed Policy is muddled.
	(a.)	CPRE Surrey Branch Guildford	CPRE supports this policy. However, we should like to see some recognition of the benefits in terms of outdoor recreational activity that result from easy access to the open countryside from the town. We also would like some mention of the value of registering village greens and providing allotments. No more golf courses are required.
	(a.)	Downsedge Residents' Association	Acceptable.
	(a.)	East Horsley Parish Council	We endorse this policy.
	(a.)	Guildford Business Forum	GBF broadly supports this policy. Investment in the promotion of healthy living should be encouraged and will help to minimise the financial and resource burden to medical and other support services within the Borough that sedentary lifestyles can bring.
	(a.)	Guildford Cathedral	The dean and chapter broadly support this policy. Investment in the promotion of a healthy living should be encouraged. The dean and chapter note however that circumstances can arise whereby the development of some open space might in some instances be desirable or necessary. Further comment is provided in our comment to CP18.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Society	CP17: First para – should this not be included in CP16 or CP18? The words “well-being” should be reserved for CP19. Second para - Reference should be made to the source of the specification for Health Impact Assessments. Is there a government code? If not, delete.
	(a.)	Surrey County Council	An additional means of promoting healthy lifestyles amongst children is to support safe walking and cycling routes to schools.
	(a.)	University of Surrey	The University of Surrey broadly supports this policy. The University of Surrey notes however that circumstances can arise whereby the development of some open space might in some instances be desirable or necessary.
	(a.)	Vail Williams	The Royal Surrey County Hospital supports the suggestion of planning obligations towards health infrastructure where required. The Trust would support a robust and clear Infrastructure Development Plan Document which sets out a rationale for provision of contributions towards services offered by the Royal Surrey County Hospital.
	(a.)	Vail Williams	Para 9.103: The paragraph refers to the Primary Care Trust but should include reference to the Royal Surrey County Hospital as a local provider.
	(c.)	Carter Planning Limited	yes
	(d.)	Carter Planning Limited	no
	(d.)	Crownhall Estates	This is truly a 'bridge too far'; people buying or renting property are best able to determine their own lifestyle choices without some 'nanny state' nonsense imposed upon them by GBC by a 'Health Impact Assessment'. How do you intend to enforce and police the provisions of such a report commissioned at cost by a developer or his professional advisors?
	(d.)	Guildford Business Forum	It should be noted that circumstances can arise whereby the development of some open space might in some instances be desirable or necessary. Additional space for allotments should be identified and allocated.
	(e.)	Carter Planning Limited	It would be preferable if the Proposed Policy related to health infrastructure. The inclusion of methods of travel and open space provision overlaps with and duplicates other policies and detracts from the main thrust of this Proposed Policy.
	(e.)	Holy Trinity Amenity Group	Agree, except add: Improvements to pedestrian and cycling facilities will encourage routine day to day journeys to be made in these ways, e.g. as whole or part of journey to work, with associated health benefits.
	(e.)	Sport England	Sport England would like to lend its support to Policy CP17 which seeks to encourage development which promotes healthy living. However, we would suggest that alongside open space the policy text is amended to include a wider range of sport and recreational provision as promoted within Policy S3 'Supporting Healthy Communities' of the draft South East Plan (July 2008). In relation we would suggest that alongside reference to Policy CP18, the supporting text in paragraph 9.102 is also amended to reflect the linkage between this policy and Policy CP19 Well-being, leisure and culture.
CP18	(a.)	Barton Willmore	We support this policy
	(a.)	Barton Willmore	We support this policy
	(a.)	CPRE Surrey Branch Guildford	CPRE supports this policy. The advent of the University of Surrey at Guildford has taken a large stretch of open space at Manor Park campus that was located close to some of the most highly developed wards in the town. Playing fields also continue to be lost in Guildford. We would welcome the prospect of open space land owned by GBC being better managed and maintained (eg Tyting Farm).

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Downsedge Residents' Association	Title could be improved but otherwise acceptable.
	(a.)	East Horsley Parish Council	We endorse this policy.
	(a.)	Environment Agency	The inclusion of accessible open space for wildlife in this policy is welcomed. We support the inclusion of river corridors in the supporting text, and the exploration of the multi-functional potential of areas of green space. Should the multi-functional nature be included in the policy itself? The use of green roofs can provide usable green space, as well as provide a host of environmental benefits. We would like to see this explored in policy CP18.
	(a.)	Guildford Environmental Forum	The statement "Provision and maintenance of new good quality, accessible green open spaces for informal recreation, wildlife habitats and formal play facilities will be promoted" is welcomed and supported. Likewise the supportive approach to wildlife contained in paragraphs 9.107, 9.108 and 9.113 is also welcomed. This policy contains the phrase "A decrease in the overall amount of open space in the borough will be avoided where possible." It would be better as "A decrease in the overall amount of open space in any part of the borough will be avoided where possible". Under current circumstances there should be an overall increase of open space in the borough due to the requirements of the Thames Basin SPA, so without the clarification suggested the statement would be meaningless.
	(a.)	Guildford Society	We suggest that "Open Spaces" would be a more suitable title. We regard the policy as very important: at present too many developers are allowed to get away with providing little or no new amenity open space.
	(a.)	Howard Hutton & Associates	The Core Strategy is unclear whether meeting Natural England's "ANGS" strategy will become a requirement for all new development. The Core Strategy should make it clear that this is an aspiration not a policy.
	(a.)	Member of the public	The statement "Provision and maintenance of new good quality, accessible green open spaces for informal recreation, wildlife habitats and formal play facilities will be promoted" is welcomed and supported. Likewise the supportive approach to wildlife contained in paragraphs 9.107, 9.108 and 9.113 is also welcomed.
	(a.)	Natural England	Natural England believes that the provision of green infrastructure should be an integral part of the creation of sustainable communities throughout England. Networks of multi-functional greenspace providing a wide range of environmental and quality of life benefits should be identified in regional and local plans and designed into all major new development and regeneration schemes from the outset. The Infrastructure SPD, or a Green Space Strategy, should set out how Guildford Borough Council will plan, provide, and manage networks of accessible multifunctional greenspace, as stated in the South East Plan policy CC8. We would wish to see an overall net gain in green infrastructure and the encouragement of development proposals which improve the quality and quantity of accessible green space, where appropriate. We would also like to see specific reference to ANGST standards and how it will be applied.
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	Notes that Strategic Development sites will be required to provide open space on site. However paragraph 9.106 (page 81) notes that the PPG17 Audit of Open Space, Sport and Recreation Facilities (2005) identified an overall deficit in urban areas in amenity open space, playing fields and parks. Difficult to see how this can be remedied by a reliance on town centres for future housing provision. The opportunity to explore a sustainable urban extension to the south of the town could assist in this respect.
	(a.)	Shalford Parish Council	recognition of importance of access to natural green space and natural play (9.107), and policy of protecting existing open space and providing new open space (9.107 and 9.109)

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Solum Regeneration Partnership	We object to strategic development sites having to provide open space on site as in the town centre this would not be possible or appropriate where uses on brownfield sites should be maximised. The wording should be flexible and the quantum and type of open space should be determined on a site by site basis. We would therefore recommend the insertion of the words “where appropriate” at the beginning of the fourth paragraph.
	(a.)	Sport England	Sport England supports the principle of this policy but would suggest that the second paragraph of the policy is amended to include the promotion of ‘formal’ as well as informal recreation. This would ensure the promotion of such provision which is important to the aim of the policy and ensure consistency with the wording in penultimate paragraph of the policy. Sport England’s objection to this policy relates to the use of and reliance of an assessment against national standards of provision as presented in paragraph 9.106. Sport England is aware that the PPG17 Audit of Open Space, Sport and Recreation Facilities (2005) assessed provision within the Borough against the Fields in Trust (formerly NPFA) Six Acre Standard. Sport England would therefore expect the LDF and Core strategy to be supported by local standards that have been informed by a sound and robust evidence base which has assessed local need against local supply.
	(a.)	Surrey Countryside Access Forum	New residential developments will be required to provide the following: 1. At least 0.4ha (1acre) of amenity open space per 1000 people (based on an occupancy rate of 2.5 persons per dwelling) must be provided for all developments of 5 units or more. The amenity open space is required to be publicly accessible and shall always be provided within the development site. 2. Children’s Play Areas are required in developments over 50 dwellings. The play area should include a fixed equipment play area and grassed area. The play space should meet the National Playing Fields Association design and size standards and should integrate a Local Equipped Area of Play. Major developments should include Neighbourhood Equipped Areas of Play. A financial contribution towards recreational provision in the borough will be required per unit for developments not providing a useable children’s play area on site of an appropriate size and scale regardless of existing provision. 3. Playing Fields: Financial contributions will be required per unit in all developments. This money will be ‘pooled’ and used to improve existing facilities and provide new facilities. Town centre sites will be required to provide a financial contribution per unit but will not be required to provide open space on-site. Recreational Open Space Provision in Relation to New Commercial Developments Commercial sites above 1000 square metres in floor area are required to provide landscaped amenity open space.
	(a.)	Surrey County Council	We would an enabling policy for where it is acceptable to dispose of playing fields in order to fund refurbishment or building of educational infrastructure. A school could provide an area with greater biodiversity and, therefore, of higher value. A playing field is usually nearly a monoculture of limited biodiversity. The provision of higher value green space with greater biodiversity would be beneficial and offset the reduced area of green space.
	(a.)	University of Surrey	The University of Surrey broadly supports this policy. However the policy should recognise that circumstances can arise whereby the development of some open space might in some instances be desirable or necessary. The University of Surrey would therefore suggest that the final sentence of supporting text paragraph 9.109 is amended to reflect circumstances, which can arise whereby the development of some open space might be desirable and necessary.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Vail Williams	Commercial developments should not be required to contribute towards open space requirements. A Development Plan Document relating to Infrastructure would be more appropriate as it would be fully tested and transparent.
	(c.)	Guildford Society	There is some confusion because 9.111 states that the infrastructure SPD is to be revised following adoption of the Core Strategy, while paragraph 2.5 of the present Infrastructure SPD (September 2006) states that a change to the open space thresholds is proposed through the emerging Core Strategy. Paragraphs 2.7 to 2.11 of the present Infrastructure SPD specify space requirements in accord with R2, R3 and R4. We regard these requirements as vital to the wellbeing of residents and recommend that CP18 states that the requirements of the present Infrastructure SPD will not be diluted when it is changed.
	(d.)	Guildford Business Forum	GBF considers that allotments should be mentioned in this policy and that allotments should be protected from development. Additional space for allotments should be identified and allocated. Whilst GBF broadly supports this policy we consider that the policy should recognise that circumstances can arise whereby the development of some open space might in some instances be desirable or necessary. We suggest that the final sentence of supporting text paragraph 9.109 is amended to reflect circumstances which can arise whereby the development of some open space might be desirable and necessary.
	(d.)	Guildford Cathedral	The dean and chapter broadly support this policy. We note that circumstances can arise whereby the development of some open space might in some instances be desirable/necessary. The dean and chapter would suggest that the final sentence of supporting text para. 9.109 is amended to reflect circumstances, which can arise whereby the development of some open space might be desirable and necessary.
	(d.)	Member of the public	Provision of facilities for youth and others in the community, primarily a BMX track (close to spectrum?). Will encourage greater participation and BMX will feature in 2012 Olympics so will become popular
	(d.)	Woodland Trust	Para 9.105 We would like to see woodland included in the list of public open spaces in this paragraph since it is such a vital element in green infrastructure, providing a range of benefits to communities from access to nature to cleaner air and water.
	(d.)	Woodland Trust	Para 9.106 In considering the existing provision of open space in the Borough we believe the council should also note the Trust's Woodland Access Standard which recommends: <ul style="list-style-type: none"> •that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size •that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes.
	(e.)	Guildford Environmental Forum	Suggest modify to: "...commercial developments of 1000 m2 or more will need to provide open space and measures to attract and support wildlife".
	(e.)	Holy Trinity Amenity Group	We welcome most of the statements made. However we disagree with the statement "A decrease in the overall amount of open space in the borough will be avoided where possible." We ask that this be replaced with "An increase in overall open space in the Borough will be sought to match the increase in local population and to mitigate the effects of high density residential developments. Particular attention will be given to obtaining new open space on the urban fringe, where it can be easily accessed from nearby residential areas. This may be from procurement, by access agreements, or by creation of new rights of way and permissive paths."
	(e.)	Howard Hutton & Associates	Delete any reference to Natural England's "ANGS" strategy if this is to become policy and downgrade to an 'aspiration'.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	King Sturge LLP	Para's 9.106 & 9.111 - Supporting text must include acknowledgement that the Fields in Trust standards are for guidance purposes only, having being prepared on a national basis. These do not always accurately reflect local characteristics in terms of population profile and existing provision. It must be acknowledged that these standards should not be used for development control purposes.
	(e.)	Ockham Parish Council	On behalf of Ockham Parish Council - CP18 line 2 - should not "publically" be "publicly"?
CP19	(a.)	Carter Planning Limited	yes
	(a.)	CPRE Surrey Branch Guildford	We support this policy.
	(a.)	Downsedge Residents' Association	Title could be improved but otherwise acceptable.
	(a.)	East Horsley Parish Council	We support this policy where it will engender a feeling of local community in East Horsley as a village where "people belong" and want to live.
	(a.)	Guildford Cathedral	The dean and chapter support this policy
	(a.)	Guildford Society	CP19: Delete last para – it is discriminatory against people who are not young or old.
	(a.)	Surrey Countryside Access Forum	Development which results in the loss of any urban and rural open space with recreational, visual, strategic or wildlife value or land and buildings used for sport and recreational purposes will not be permitted unless the applicant demonstrates when submitting a planning application that: 1. A suitable alternative equal to or resulting in a net gain in size and quality is provided nearby or integrated as part of the new proposal; or 2. It has been proved that the facility or site is surplus to requirements and the potential for use as an alternative leisure and recreational facility has been fully explored; and 3. Relocation of the facility or site will achieve a better and more accessible network of leisure and recreational facilities; or 4. Sports or recreation facilities or open space can best be retained and enhanced through the redevelopment of a small part of the site: or 5. The proposed development is ancillary and associated with the existing recreational use of the site or facility.
	(a.)	The Theatres Trust	it is important that your local cultural facilities are protected and enhanced with provision for new or improved facilities made to ensure the health and well-being of the population. Major new developments, such as mixed use areas and urban extensions, should include plans for cultural facilities to ensure the population have the capacity to reap the health and social benefits which accrue from participation in regular cultural activities.
	(a.)	University of Surrey	The University of Surrey supports this policy.
	(a.)	Vail Williams	The term 'well used' is ambiguous and unclear.
	(b.)	Carter Planning Limited	no
	(c.)	Carter Planning Limited	yes
	(d.)	Carter Planning Limited	see above
	(d.)	Guildford Business Forum	GBF supports this policy but considers that allotments should be mentioned in this policy and that allotments should be protected from development. Additional space for allotments should be identified and allocated.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Member of the public	Provision of facilities for youth and others in the community, primarily a BMX track (close to spectrum?). Will encourage greater participation and BMX will feature in 2012 Olympics so will become popular
	(d.)	Terence O'Rourke on behalf of Wharf Land Investments (Jersey) Ltd.	Policy CP19 affirms Guildford Borough Council's support for the promotion of leisure. Many leisure uses will be well suited to a peripheral location, where expansive and all encompassing facilities can be placed on one site, in an attractive setting capable of encouraging recreational and leisure activities. Leisure uses represent a key component of social infrastructure, as defined in the Core Strategy. Many such infrastructural assets are likely to be needed and best suited to placement in peripheral locations, on sites such as the former WA. Policy CP19 should contain explicit support for peripheral leisure developments, to avoid suitable applications being frustrated, contrary to the key leisure objectives established within the Core Strategy. Policy CP19 should have the following text inserted: "Green Belt sites may be particularly suitable for leisure and cultural development, where very special circumstances can be proven to exist in order to warrant development occurring"
	(d.)	Wey & Arun Canal Trust Ltd	Paragraph 9.105 makes reference to "...canals and rivers..." as being part of the provision of leisure facilities within the Borough. I think the paragraph should refer to the "development and restoration of a canal and river network" in the Borough. The increasing need for leisure facilities could be met, in part, by such provision with space for walking, boating, riding and cycling.
	(e.)	Carter Planning Limited	At the end of the second paragraph add "...location or unless they are uneconomic". It is pointless to require a community facility to remain if no one uses it.
	(e.)	Holy Trinity Amenity Group	Agree, but add "A replacement Civic Hall, or similar, will be provided and maintained for the future". This is absolutely essential to the achievement of the stated objectives.
	(e.)	Sport England	Sport England supports this policy but does raise a question of the inclusion of the term 'well used' in the second paragraph. It is unclear from the supporting text how a 'well-used' facility would be defined. For consistency Sport England would suggest that the wording is amended to refer to the term 'surplus to requirements' in line with paragraph 10 of PPG17. In addition, for clarity it is suggested that the policy should state the requirement for reprovision of 'equivalent or better' provision in terms of quantity, quality and accessibility rather than just reading 're-provided in a suitable location'.
	(e.)	Surrey County Council	Para. 9.113 (CP19) – a sentence should be inserted here, making specific reference to the ongoing protection and enhancement of archaeological sites and monuments, listed and other historic buildings, parks, gardens and landscapes within the managed growth of the Borough in order to best serve the local community and improve the quality of their working and leisure environment.
CP20	(a.)	Barton Willmore	We do not object to these policies at this stage but request that any such requirements can be fully justified
	(a.)	Barton Willmore	The requirements of the Sustainable Code for Homes and BREEAM are to be delivered through the buildings regulations, therefore should not be prescribed in the Core Strategy. Reference to Code for Sustainable Homes Level 4 should be removed from Policy CP20.
	(a.)	Blackwater Valley Friends of the Earth	Do not agree that inefficient developments should be allowed to buy themselves out by a one-off contribution to a carbon offset fund. Unsustainable developments should not be allowed. Policy should also include that new residential developments must have the ability to have at least 50% of their energy consumption produced sustainably through the use of CHP or renewable means such as solar thermal and solar electric panels.
	(a.)	CPRE Surrey Branch Guildford	We support this policy. We welcome the strategic objective expressed in EPE4. We would like to see a definition of sustainable development provided.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Downsedge Residents' Association	Title could be improved. First paragraph, last bullet point. Although this requirement could be regarded as a 'stealth tax' we support it in principle. However, clarification is needed (perhaps in the supporting text) on whether it would apply to the whole building in the case of an extension or, say, a kitchen refurbishment, or just to the new construction, and as to how the energy efficiency requirement would be triggered and monitored. Also, the last sentence of this bullet point is misleading: the justification is the longer term energy efficiency rather than the emissions during construction. Paragraphs 9.117-9.121. (a), (e) In 9.121 delete "widely acclaimed" (sounds like special pleading) and expand to cover the points made above in II/102. Otherwise acceptable.
	(a.)	DPP	Applying the maximum figure from the above policy (i.e. energy efficient measures of up to 10% of the cost of works) would represent a significant cost to commercial extensions and refurbishments. We consider that the implementation of this policy is not feasible for future commercial development, particularly in the current economic market. As such, this policy should provide clarification that not all commercial development would be expected to reach the maximum 10% figure and that the Council will be flexible in their approach to enable development to be implemented in the current market.
	(a.)	Guildford Business Forum	Whilst supportive in principle of this policy, GBF are nevertheless concerned by the proposal to require all new residential developments to meet Code for Sustainable Homes Level 4 and all new commercial development to attain a BREEAM excellent rating. The Council may not be aware of additional costs involved per unit. For the borough to impose construction standards which are tougher/more expensive than the requirements of building regulations(as updated from time to time) may make developers less inclined to carry out developments within the Borough.
	(a.)	Guildford Cathedral	The dean and chapter support this policy and the introduction of a requirement for all new residential units to achieve at least code for sustainable homes level 4.
	(a.)	Guildford Society	We support the objectives of this policy. We wonder if the objective can be obtained by simpler means. It would be better to wait for appropriate building regulations to emerge, as they surely will. We oppose the financial proposals of the second bullet point because we think that the Council should put in place firm proposals for how the money in the fund will be spent before launching a policy to raise it. It will be seen as yet another tax. Again, reliance should be on building regulations, rather than on financial measures.
	(a.)	Home Builders Federation	There is no evidence given as to why Guildford Borough should unilaterally require dwellings to be built to Code level 4 before the national target date of 2013. Indeed, the Core Strategy recognises that this is a national target and being sought through national building regulations. Similarly the Council seek to impose their own carbon tax on development that does not meet its own onerous target; something else that national government has been keen to point out should be expressed nationally rather than locally. The policy should be deleted. If the policy is to be retained (for which there is no justification), it is clear from the supporting text that the Council is only requiring the energy efficiency savings to meet Code level 4, not the entire Code for Sustainable Homes. This should be made clear in the policy if it is to be retained.
	(a.)	Howard Hutton & Associates	We consider that new-build residential units should achieve Sustainable Homes Level 3 until 2013. The cost implications for achieving Level 4 are likely to significantly increase the cost of development, which in turn will reduce the viability of marginal sites to the extent that they will not come forward.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Member of the public	Policy CP20 & Policy CP21 - These sections are quite inappropriate. Government policy in the Sustainability area is being consulted on, inter alia by way of the document: "Definition of zero carbon homes and non-domestic buildings". The text of the Consultation makes it quite clear that there are considerable financial and practical difficulties in moving up the scale of carbon conservation. It suggests steps and a timetable. GBC lacks the expertise and research background to second-guess the Government in this highly technical area. The GBC document itself recognises that the Government proposals only go up to 2016, and suggests that subsequent moves can be dealt with by amending the Infrastructure SPD. It is not appropriate to amend firm requirements in a statutory Approved Plan by way of supplementary documentation. It is suggested that the correct position for a Strategy Plan such as this is simply to say that it will, as far as appropriate for a 'Spatial Strategy' seek to implement developing Government policy, and will publish the relevant current requirements in SPD's.
	(a.)	Peacock and Smith on behalf of Morrisons supermarkets	This policy requires that the all new-build commercial units achieve a BREEAM rating of 'excellent'. Morrisons object to such a requirement as no one has asked if this is standard 'excellent' is achievable/realistic. Our client requests that any such policy contains text which confirms that a requirement to meet BREEAM standard 'excellent' would be subject to tests of viability/suitability.
	(a.)	Sainsburys	In relation to the text at the first bullet point which states that 'All new build commercial units should achieve at least a BREEAM Excellent rating' it is recommended that additional text is added stating that extensions to retail units be exempt from this requirement. Additionally, BREEAM was mentioned in Draft South East Plan Policy EN1 – however, this has now been superseded by Policy NRM11 and BREEAM is no longer cited as a target. It is possible that the Building Regulations are the most appropriate way of ensuring the highest possible standard of sustainability. BREEAM 'Excellent' standard could be considered onerous as the usual target is 'Very Good' with an aspiration for Excellent or above.
	(a.)	SEEDA	SEEDA welcomes CP20 which seeks high standards of sustainability in new development including achieving CSH level 4 and BREEAM excellent ratings as a minimum, and the implementation of energy efficient measures up to 10% of the cost of works. We encourage the local authority to retain some degree of flexibility within this policy to ensure that development is not compromised
	(a.)	Solum Regeneration Partnership	Object <input type="checkbox"/> The policy requiring Code for Sustainable Homes level 4 and BREEAM Excellent is too inflexible as it does not allow for Government change or a delay or acceleration in the required CSH level. We recommend the wording of the policy is revised to state "the Code for Sustainable Homes/BREEAM level will be determined at the time of an application".
	(a.)	Surrey County Council	Policy CP20. We SUPPORT the objective of obtaining the highest possible standards of sustainable design and construction for buildings, comprising Code Level 4 under the Code for Sustainable Dwellings, and BREAM Excellent rating for non-residential buildings. We also SUPPORT a measure of retro-fitting such design and build principles when dealing with refurbishment and conversions etc.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Terence O'Rourke	<p>Policy CP20 requires that residential development should achieve at least level 4 of the Code for Sustainable Homes standards. The Further Options document highlights that national policy does not require this until 2013, for very good reason. Therefore whilst this target may be desirable it should not be a requirement.</p> <p>25. Do you agree with the approach of the policy/section? – No</p> <p>c) Are you satisfied that the approach / section / policy reflects national and regional policy and addresses key local issues facing the borough?- No</p> <p>Required Change:</p> <p>26. Guildford Borough Council should not require developers to build to Code for Sustainable Homes level 4 ahead of timescales established in national targets.</p>
	(a.)	University of Surrey	The University seeks to incorporate these principles in the development of their estate. The introduction of a requirement for all new residential units to achieve at least Code for Sustainable Homes level 4 is supported.
	(a.)	Vail Williams	The quality of developments may suffer as the cost of works are minimised in conflict with National and Local Policy. The cost of works should not be a consideration and therefore reference should be removed from Policy CP20.
	(c.)	East Horsley Parish Council	GBC must resist the imposition of regional or national policy requirements which would lead to less sustainable development than the policies proposed by GBC.
	(c.)	King Sturge LLP	There is no policy guidance legitimising any of the minimum requirements set within this policy, either with regard to the Code for Sustainable Homes level 4 / BREEAM Excellent aspirations or the implementation of energy efficiency measures as part of refurbishment / conversion / extension. It is recognised that sustainable development initiatives such as these such be encouraged, but mandatory requirements should be left to be implemented through the Building Regulations regime.
	(d.)	Burpham Community Association.	The statement "one-off financial contribution", could be considered a get out clause. Is it a contribution or a mandatory fee? Will the council take local resident requirements, needs, demands into consideration before accepting the alternative contribution? Will the contribution be put into the carbon off-set fund for the immediately impacted area? e.g. if a supermarket was built on the Green Man and for some reason was not able to meet the required environmentally friendly requirements would the supermarket's contribution to the carbon fund benefit the area immediately around the Green Man?

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Environment Agency	<p>This policy is focussed towards carbon emissions, which is not the only consideration for sustainable development and construction. With the policy title as submitted, the policy fails to encompass many of the issues which should be covered by sustainable development, and does not link to all the issues covered by the Sustainable Development and Construction SPD. As submitted, this policy only relates to reducing carbon emissions, which only achieves a small part of sustainable development. Allowing a one-off carbon offset payment where these targets can not be met will not help in other issues of sustainable development/construction.</p> <p>Sustainable Construction: Whilst we have specific topics we would expect this policy to cover, the terms Sustainable Development and Sustainable Construction cover a very broad area, which will need to be expanded. In particular the Environment Agency would expect to see the following considerations included in this policy:</p> <ul style="list-style-type: none"> •Undertaking site waste management plans •Efficient use of water resources •Sustainable drainage <p>Water Resources As the whole of the SE is an area of serious water stress, and much of the Wey catchment is over-licensed (Wey CAMS, 2008), from a water resources perspective we expect to see more clarification in Policy CP20 about which aspects of the CSH will be met. Specifically it would be nice to see some reference to water efficiency required to reach CSH level 4.</p> <p>BREEAM excellent is suitable for commercial developments. Saving water goes hand in hand with saving carbon: less heating of water in the home, less abstraction, treating and pumping costs, etc.</p> <p>Sustainable Drainage Sustainable urban drainage systems (SUDS) was previously incorporated in the flood risk policy, but has been omitted in the current version. The sustainable design and construction policy should highlight the multi-functional benefits of SUDS, including those to: water quality, flood risk, biodiversity and amenity.</p>
	(d.)	Guildford Environmental Forum	<p>CP20: We therefore recommend an additional requirement in CP 20 that "All new buildings will have to be leak pressure tested and the report signed off that all leak points have been properly sealed". There are precedents for pressure testing all new buildings not just a sample, which is current UK practise.</p>
	(d.)	Guildford Environmental Forum	<p>Following 9.121: Because of the urgent action needed to match the government's interim CO2 targets within the strategy period to reach the 80% by 2050 reduction target we suggest a new proposition that "Building developments of greater than 500 dwellings and commercial developments greater than 2500 m2 should achieve Code for Sustainable homes Level 6 for energy and water". For such large developments we should not wait for the legislation to require this measure in a few years time.</p> <p>Following 9.121: We suggest: "To meet climate change CO2 reduction targets it will be necessary to upgrade the energy performance of existing homes in the borough. A programme to incentivise home owners and landlords to carry out the most cost-effective energy saving measures will be introduced". Hypothecated funds from carparking and exemptions can be used.</p>
	(d.)	Guildford Environmental Forum	<p>Flexibility is needed to raise the 20% renewable energy requirement across all new developments and above 20% as the zero-carbon legislative deadlines of 2016 (domestic) and 2019 (non-domestic) approach. The current wording may not allow for this.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Member of the public	There is contradiction in the statement "the Council is committed to achieving the highest possible standards of sustainability in all development" and then stating that "All new-build residential units should achieve at least Code for Sustainable Homes level 4. Suggest as Climate Change will so seriously affect us all and the necessary construction techniques are currently available that all new-build residential units should be Code for Sustainable Homes level 6. The borough should lead on this issue.
	(d.)	Surrey County Council	Policy CP20 is welcomed as far as it goes, but it fails to deal adequately with emerging South-East Plan Policy W1 and Policy W2, or Policy CW1 of the Surrey Waste Plan which seeks to take forward action on waste minimisation as part of the agenda for a more sustainable future. A new clause should be added to the policy requiring the on-site recycling of construction, demolition and excavation waste (CDEW) wherever practicable in order to reduce the demand for primary land-won aggregate extraction and minimise the amount of CDEW that is sent to landfill. This will provide additional context for the proposed Sustainable Development and Construction SPD.
	(d.)	Surrey County Council	Policy CP20. This policy concentrates on how buildings should be constructed sustainably and misses other themes, such as transport sustainability, which can reduce emissions. Also reducing urban surface water run-off by SUDS, and the use of reclaimed or recycled materials to reduce use of new construction materials etc.
	(d.)	The Planning Bureau Ltd.	Policy CP20 & Paragraph 9.121 - I would comment that the Council need to be aware that Policy CP20 and the subsequent Policy CP21 will have a significant impact on the build cost of development. Providing the Council have undertaken an assessment of the likely impact of these policies on development costs and its consequent impact for other planning obligations then I do not object to the principle of the policy. The Council should considered listing what its planning priorities are in the event that development cannot fully comply with all policies of the Core Strategy on grounds of economic viability.
	(e.)	East Horsley Parish Council	Para 9.117. Most people would accept that efficiency and conservation are important steps in achieving sustainability but the evidence to show they are the "most important" steps should be included in the Core Strategy if this distinction is fundamental to the policy.
	(e.)	Guildford & Waverley Friends of the Earth	The Council is committed to achieving the highest possible standards of sustainability in all development. As a minimum, the following must be demonstrated: <ul style="list-style-type: none"> • All new-build residential units should achieve at least Code for Sustainable Homes level 4 with level 6 for water. All new build commercial units should achieve at least a BREEAM Excellent rating. • Where the Council is satisfied that the relevant efficiency measures are not or cannot be achieved development will generally be refused. • Refurbishments, conversions and extensions to both residential and commercial buildings will be required to implement energy efficiency measures up to 10% of the cost of the works. This will contribute toward off-setting emissions that occur during construction.
	(e.)	Guildford Society	G1(9): Energy Conservation. Gives a general aim. Replaced by CP20 and CP21 which impose much more precise conditions. CP20 appears to impose a 10% conservation tax on all refurbishments, conversions and extensions, to be spent on improving the insulation etc of the existing house. Government gives grants for home insulation etc. and government policy should be reflected in local LDF's. Remove or completely rewrite para.
	(e.)	Howard Hutton & Associates	Amend para 9.118 to require new homes to meet Code for Sustainable Homes Level 3.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Surrey County Council	Para. 9.116 CP20 - a sentence should be inserted here drawing specific reference to the ongoing protection and enhancement of archaeological sites and monuments, listed and other historic buildings, parks, gardens and landscapes within the managed growth of the Borough. In particular, this should highlight the sensitive reuse of historic buildings as a form of sustainable development, recognising the long-term 'carbon capture' that historic buildings represent and the possibilities for the enhanced energy efficiency of such buildings.
	(e.)	WYG Planning and Design on behalf of Sainsbury's Supermarkets Ltd.	First bullet point states that 'All new build commercial units should achieve at least a BREEAM Excellent rating' it is recommended that additional text is added stating that extensions to retail units be exempt from this requirement. The Draft South East Plan Policy EN1 has now been superseded by Policy NRM11 and BREEAM is no longer cited as a target. It is possible that the Building Regulations are the most appropriate way of ensuring the highest possible standard of sustainability. BREEAM 'Excellent' standard could be considered onerous.
CP21	(a.)	Barton Willmore	We do not object to these policies at this stage but request that any such requirements can be fully justified (refer to our comments in response to Policies CP10 and CP12 above).
	(a.)	Barton Willmore	It is requested that any such requirements of Policy CP21 can be fully justified (refer to comments made in response to Policies CP10 and CP12 above).
	(a.)	Blackwater Valley Friends of the Earth	20% of renewable or low-carbon generation is not sufficient. A minimum of 50% is required. Renewable energy schemes should not be exempted where townscape and landscapes are compromised since this is purely subjective and appropriate renewable energy schemes now exist on the market(i.e. solar electric roof tiles) that will blend in.
	(a.)	BWEA	Respondent didn't relate any points to specific policy but made general suggestions as to what the LDF should do/achieve. They strongly recommend the inclusion of an overarching climate change policy within the Core Strategy document, robust criteria based policy that will be used to assess all applications for renewable energy developments and not to make assumptions about the technical and commercial feasibility of renewable energy projects.
	(a.)	CPRE Surrey Branch Guildford	CPRE supports this policy.
	(a.)	Downsedge Residents' Association	Uncertain whether this is a suitable topic for inclusion as a Core Policy, and should like to see arguments on both sides. Wording acceptable.
	(a.)	Guildford & Waverley Friends of the Earth	1. There is a need for a more precise and decisive waste policy which sets up minimisation as the first aim and then considers the need for providing infrastructure for collection of segregated waste streams to enable reuse and recycling and potentially low-carbon energy generation. 2. Re the policy in relation to renewables, there is no need to qualify this beneficial policy with a vague and meaningless reference to landscape. Landscape is already fully protected by other policies both at national and local level. It is for the government to decide the overall policy in relation to the importance of renewables – we believe this proposal by Guildford is contrary to national policy and is unsound. It should be deleted.
	(a.)	Guildford Business Forum	GBF supports this policy, but consider that greater clarity is required as to how the requirement to generate a minimum of 20% renewable or low carbon energy might be achieved.
	(a.)	Guildford Cathedral	The dean and chapter support this policy, but consider that greater clarity should be given regarding how the requirement to generate a minimum of 20% renewable or low carbon energy might be achieved.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Constituency Labour Party	<p>In the 2nd para, change “1000sqm of non residential space” to “500sqm of nonresidential space”. The Borough currently sets the lower limit for requiring renewable energy at 500sqm. No justification has been offered for not keeping the figure at 500sqm. A development of this size offers ample renewable energy opportunities. (b)The 3rd para “renewable and low carbon will also be encouraged.....commercial development, except where this may compromise valuable landscapes or townscapes”, Change “, except where this may compromise valuable landscapes or townscapes” to“. However, the benefits from these will have to be balanced against any degrading effect on valuable landscapes or townscapes”</p> <p>The present wording seems to bar any renewable energy or low carbon development regardless of the size of its benefits if it compromises valuable land or town scapes. The wording should be altered to allow a more balanced view to be taken.</p>
	(a.)	Home Builders Federation	<p>This policy has been poorly thought out and provides little guidance of how the Council will assess proposals for energy efficiency in buildings or the competing technologies of on and off site renewables. It sets an unrealistic and over ambitious target while giving no indication of how such savings will be measured or assessed or how it will cope with changing technologies over time. The Council will need to undertake considerably more work and produce a more robust evidence base if they wish to promote such a policy within their Core Strategy. The policy should be deleted.</p>
	(a.)	Member of the public	<p>Policy CP20 & CP21 - These sections are quite inappropriate. The text of the Consultation makes it quite clear that there are considerable financial and practical difficulties in moving up the scale of carbon conservation. It suggests steps and a timetable. GBC lacks the expertise and research background to second-guess the Government in this highly technical area. The GBC document itself recognises that the Government proposals only go up to 2016, and suggests that subsequent moves can be dealt with by amending the Infrastructure SPD. It is not appropriate to amend firm requirements in a statutory Approved Plan by way of supplementary documentation. It is suggested that the correct position for a Strategy Plan such as this is simply to say that it will, as far as appropriate for a 'Spacial Strategy' seek to implement developing Government policy, and will publish the relevant current requirements in SPD's.</p>
	(a.)	Nathaniel Lichfield & Partners	<p>The Co-operative Group support this Policy, in particular the implication that smaller developments (less than 10 dwellings, 1,000 sq.m non residential floorspace or on sites of less than 0.5ha) are not required to generate a minimum of 20% renewable or low carbon energy. We support the recognition that these targets are not always achievable in relation to small schemes, the text should be clarified to confirm that the requirements do not apply to small schemes. We also consider that there should be some flexibility to allow for instances where the requirements may not be achievable in relation to larger schemes. It should also be recognised that it is not always possible or practical for renewable energy sources to be located on-site, as such an onerous requirement might prejudice sites coming forward for development, particularly in key regeneration areas. Furthermore, development sites might not always be the best location for such facilities.</p>
	(a.)	Sainsburys	<p>The required levels of renewable and low-carbon energy to be generated from large developments set out in this policy (i.e. 20%) can be viewed as onerous. It should therefore be altered to reflect the 10% requirement of the Draft South East Plan.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	SEEDA	SEEDA welcomes the commitment within this policy to securing 20% renewable/low carbon energy contributions from developments of 10 or more dwellings, 1000sqm or more non-residential floorspace or sites of 0.5ha or more. We also welcome the statement that renewable and low carbon power generation, including CHP will be encouraged where feasible and acceptable.
	(a.)	Solum Regeneration Partnership	Object - We consider the policy should be reworded to state "renewable energy provision should be sought unless it would be unachievable for site specific reasons".
	(a.)	Surrey County Council	We SUPPORT the approach to renewable energy requirements for major schemes as indicated (some minimum of some 20% renewable energy or low-carbon development required. We suggest that the Borough should clarify whether renewable energy production, or energy saving, should be produced on-site, or in partnership as part of a district CHP scheme, or in combination with other developments)
	(a.)	Terence O'Rourke	<p>The 20% target established in the Core Strategy exceeds the requirements of the emerging South East RSS and in doing so may make many developments unviable and subsequently impede housing delivery.</p> <p>29. Relevant Consultation Questions: (a) Do you agree with the approach of the policy/section? - No (c) Are you satisfied that the approach / section / policy reflects national and regional policy and addresses key local issues facing the borough?- No</p> <p>Required Change: 30. The 20% target contained in policy CP21 should be reduced to 10%. Para 10.8 of the Further Options Document 31. Paragraph 10.8 of the Further Options Document states "In the event the AMR suggests that the planned housing requirement is predicted not to be met, the Council will use development briefs and Supplementary Planning Documents to bring sites forward for development." 32. A five year housing land supply must be identified and maintained by councils. The quickest way for a five year housing land supply deficit to be addressed is through adopting a stance of looking favourably on planning applications, as required by PPS3. Producing an SPG to maintain five year housing land supply is an approach which will take too long to implement therefore does not accord with PPS3.</p> <p>33. Relevant Consultation Questions (a) Do you agree with the approach of the policy/section? - No (c) Are you satisfied that the approach / section / policy reflects national and regional policy and addresses key local issues facing the borough? - No (e) Are any changes to the supporting text necessary? - Yes</p> <p>Required Change: 34. Paragraph 10.8 should acknowledge that the favourable consideration of planning applications is the principle mechanism by which a deficient five year housing land supply will be addressed, in accordance with PPS3.</p>
	(a.)	University of Surrey	Surrey uni supports this policy, but consider that greater clarity should be given regarding how the requirement to generate a minimum of 20% renewable or low carbon energy might be achieved. As a major developer the University takes a holistic view of its estate in terms of renewable energy.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Vail Williams	The development of non-residential floorspace to meet a minimum target of 20% renewable or low-carbon energy is onerous, especially in relation to some types of non-residential floorspace. The Policy does not allow for discussion on the matter which should be included, especially in relation to Hospital related developments.
	(b.)	Member of the public	Ground source heat pumps for both small and large developments can be better than Combined Heat and Power (CHP). Ground source heat pumps are difficult to fit into existing housing and developments, but are very suitable for new developments and are more carbon efficient than CHP.
	(c.)	WYG Planning and Design on behalf of Sainsbury's Supermarkets Ltd.	The required levels of renewable and low-carbon energy to be generated from large developments set out in this policy (i.e. 20%) can be viewed as onerous. Policy NRM 11 of the Draft South East Plan requires that only 10% of a developments energy be sourced from renewable technologies. The policy should be altered accordingly.
	(d.)	BWEA	Respondent didn't relate to any specific policies but discussed the merits of renewable energy. Talked about what LA's should do in general with regards to renewable energy policies.
	(d.)	King Sturge LLP	Unlike Policy CP12, this policy makes no allowance for viability, despite this being mentioned in supporting text. There must be reference to an allowance for viability to be taken into account as a material consideration to ensure that this policy does not deter the delivery of otherwise beneficial development. This must be referred to within the policy text.
	(d.)	Member of the public	Bio-energy is gaining acceptance. Energy derived from renewable biomass is recycling and this para should be under recycling para 9.128. Energy from renewable sources (waste) is sustainable development. The strategy promotes recycling without due regard to efficiency, cost and a real return on this heavy investment.
	(d.)	Surrey County Council	This policy is supported. Para. 9.128 refers to recycling and opportunities for in-vessel composting and anaerobic digestion waste treatment technologies being considered through the Sustainable Development and Construction SPD, and where relevant through site specific LDDs. The treatment methods highlighted seem more suited to municipal waste treatment or some individual waste streams such as commercial food waste and do not have a direct relationship to sustainable development and construction. It would be helpful if the text were clarified. The proposed SPD on sustainable construction and development is welcomed as a way of encouraging resource efficiency in design and construction and also giving a framework for recycling and re-use of construction, demolition and excavation waste.
	(e.)	East Horsley Parish Council	para 9.122-128. The Core Strategy should be more explicit about the mechanisms for making all this happen. Aspirations alone will have little impact. What targets are proposed and how will these be checked and monitored ?
	(e.)	Guildford & Waverley Friends of the Earth	"Renewable and low-carbon power generation will also be encouraged independently of residential or commercial development"
	(e.)	Guildford Environmental Forum	As technology develops within the strategy period it may be more efficient to install automatic segregated waste collection systems on large developments over 500 homes. This may reduce collection costs against the background of a large increase in the homes to be serviced in the borough. We suggest: "Automated collection systems for some segregated waste streams may become feasible on large developments, thereby reducing collection costs". Please check with James Whiteman.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Guildford Environmental Forum	first bullet point: Suggest modifying: "Renewable energy and low carbon technologies have a significant role to play in reducing the carbon emitted by power generation and space heating and insuring against diminishing and increasingly expensive fossil fuels". bullet 3: The biggest threat to our green landscape is climate change and the consequent onset of longer, deeper droughts. Climate change means we will continue to lose native trees and other biodiversity, which is the real essence of our countryside. Suggest modifying therefore: "Renewable energy and low carbon power and heat generation will be encouraged independently of ..development with the possible exception being where valuable landscapes are seriously compromised".
	(e.)	Guildford Society	CP20 appears to impose a 10% conservation tax on all refurbishments, conversions and extensions, to be spent on improving the insulation etc of the existing house. It is not quantitatively justified and could be to the comparative detriment of the Borough if neighbouring LA's do not have similar policy. Why pick on house owners who wish to extend: any such measure should be applied to all householders? Government gives grants for home insulation etc. and government policy should be reflected in local LDF's. Remove or completely rewrite para. CP21 implies that very local small scale renewable generation is more sustainable than larger scale remote renewable generation (e.g wind farms). This is not proven. A local plan should not attempt to make judgements in a technical field like this. Reference should be made to government policy, and the Core Strategy should go no further. Remove para?
	(e.)	Peacock and Smith on behalf of Morrisons supermarkets	Policy should incorporate an element of flexibility to allow for circumstances where it will not be viable/suitable to incorporate renewable energy equipment to reduce CO2 emissions by a given percentage. quotes Para. 8 of PPS22. In our view the absence of any such flexibility conflicts with government guidance within PPS22 and guide. Accordingly, Morrison requests that draft policy CP21 is amended by the inclusion of text to confirm that the percentage requirement will be suitable to tests of viability and suitability.
CP22	(a.)	CPRE Surrey Branch Guildford	CPRE supports compliance with PPS25. We do not favour any development on flood risk areas which often have considerable landscape value along the river Wey and Tillingbourne.
	(a.)	Downsedge Residents' Association	The first bullet point needs to be reworded to avoid the implication that will allocate sites and "direct" development. Although the sequential approach seems to derive from government advice, we doubt its realism. Paragraph 9.132 needs to be reworded to meet the points noted in the paragraph above. Otherwise acceptable.
	(a.)	East Guildford Residents Association	This policy is fully supported. •Regarding the River Wey, it is vital that the third bullet is followed – and it is to be deplored that the current application by GBC for Bedford Road has precisely the opposite effect. •All town centre applications adjacent to the River Wey in the town centre should seek to make better use of the River Wey in Guildford, in its function and relation to the river banks, by improving its prominence and profile in the town centre. They should encourage the visual transition from the built form to the river.
	(a.)	Guildford Cathedral	The dean and chapter support this policy
	(a.)	Member of the public	Riverside developments in towns may be acceptable but developments in the vicinity of rivers in rural areas is damaging as well as dangerous and the policy should be not to allow it at all.
	(a.)	Member of the public	The policy is not sufficiently tightly drawn to mean that, in Send, development on the Broadmead would be prohibited. The policy needs to be made stricter. Development in Old Woking is already increasing the risk of flooding in the Send area.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	National Trust	Policy CP 22, 3rd bullet point - The Trust is not clear what this policy is seeking to achieve. It seems to have little relevance to flood risk or management and refers on the one hand to use of the River whilst on the other, visual and design aspects. The supporting text does not elucidate. Clarification of the policy is required.
	(a.)	Surrey County Council	We NOTE the reference to compliance with PPS25 (Development and Flood Risk) and that development allocation will be steered to areas of lowest risk of flooding. We would advise a specific requirement for SUDS for appropriate developments to mitigate run-off and reduce flood potential within urban areas. Provided that the concept of SUDS is incorporated as a policy requirement, we SUPPORT Policy CP22 based on the Borough's Strategic Flood Risk Assessment. A definition of SUDS could usefully be included in the glossary.
	(a.)	Thames Water	Any policy in the LDF should include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development. It is vital infrastructure in place ahead of development if sewer flooding and low/no water pressure issues are to be avoided. It is also important not to under estimate the time required to deliver necessary infrastructure, for example: - local network upgrades take around 18 months - sewage treatment works upgrades can take 3-5 years
	(a.)	Trustees of the Rundle Brendon Will Trust	We are concerned by the absence of any apparent right to challenge the SFRA when the assessment appears to be wrong. We submit that the credibility of SFRA 2009 must be questionable and that their findings should be ignored for the present.
	(a.)	University of Surrey	The UniS supports this policy
	(b.)	Barton Willmore	PPS12 does not require Core Strategies to repeat or reformulate national PPG's (paragraph 4.30 refers). Policy CP22 appears to be largely national policy and is considered to be a detailed development management type policy which should not be included within a Core Strategy. Policy CP22 should be deleted as its inclusion is contrary to PPS12.
	(b.)	Guildford Business Forum	We feel that a more pragmatic approach needs to be taken to redevelopment of existing sites and their relation to flood risk. Appropriateness of design and need should outweigh the risk of flooding. Mitigation of flood risk can be managed by strong design policy and strict adherence. We do not agree with the general approach to proximity to flood risk being a influential driver. A holistic approach should be taken to redevelopment and appropriate mitigation measures taken to deliver a need that can be demonstrated. In the villages and other rural parts of the borough ditches and culverts form a major part of the drainage infrastructure of the borough and it is important that these are protected and maintained to prevent flooding. In areas where flooding currently occurs or has occurred developers should be required to carry out and submit detailed drainage studies and to submit design proposals to ensure that the development in question does not cause or exacerbate flooding.
	(c.)	Barton Willmore	As with other policies in the Core Strategy, this appears to repeat national policy (PPS25). The limited local guidance appears to be an aspiration for improving the physical environment of Guildford Town Centre and not directly related to flooding. We recommend that this Policy is deleted or amended to provide greater locally distinctive guidance.
	(c.)	Guildford Society	The table on pages 121 and 122 of the Consultation states which Local Plan policies it is intended to replace with Core Strategy core policies. G1(6): Flood Protection. Replaced by CP22. G1(6) says GBC will consult EA on flood plain sites. CP22 appears to rely on PPS25.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(c.)	Robert Shaw Planning/Vail Williams	We welcome the locally distinctive approach to development in the Urban Area that the policy adopts. This is a pragmatic and sensible approach which will assist in the provision of housing and other land uses in the Town Centre and maintain vibrant land uses close to the river. Our criticism however is that the policy wording itself is not sufficiently clear and that if a locally distinctive approach is being proposed this should be obvious in the policy's wording. This will benefit those who promote riparian developments and those whose responsibility it is to implement PPS25 in a locally distinctive manner. We suggest therefore that either a separate policy is introduced for the Town Centre (which would follow the approach of the Strategic Flood Risk Assessment) and the Urban area, or that the policy is reworded to reflect the distinction between Urban Area (including the Town Centre) and the rest of the Borough.
	(d.)	Burpham Community Association.	By developing on low risk flood areas will this increase the flooding on already high risk flood areas? What steps will be put in place to compensate those how are flooded given the council is expecting people to live in flood areas? How much flood prevention will the council expect local residents to install/pay for/maintain? e.g. there is currently a sewage flooding problem in Burpham that the council is not addressing as they seem to believe it is up to the residents to maintain the council installed drainage system.
	(d.)	East Horsley Parish Council	The policy should carry greater weight and be framed so as to prevent development altogether in high flood-risk areas. It cannot be economic to permit residential development in areas where flooding is as frequent as a nominal 1 in 20 year event based on historic statistics.
	(e.)	Environment Agency	In our response to the preferred options consultation we requested that the balancing clause referring to the benefits of the development outweighing that of flood risk. Whilst we accept that the revised policy has amended this, it still references the sequential nature of flood risk alongside other identified constraints. We note that this is only the case with flood risk and biodiversity policies in the document, and we believe this weakens these policies. The second bullet point should include something along the lines of: "in exceptional circumstances, where development in the floodplain is deemed acceptable, substantial risk reduction measures must be incorporated into development schemes located in areas at higher risk of flooding." The SFRA, and its key messages and use should be explained in the supporting text. This should include other sources of flooding – groundwater, surface water, sewer, etc. The previous preferred options consultation included the incorporation of SUDS in development, which appears to have been lost in this iteration of the Core Strategy. After mentioning the fear from flooding (paragraph 9.131), the text could reference the Environment Agency's Flood Map or the SFRA, for residents to check. Paragraph 9.131 does not clearly mention the boundaries of the Risk Reduction Measures Document. As this is to apply to Guildford Town Centre, and the surrounding Urban Area, this could mislead potential developers. Bringing the boundaries to this risk reduction measures approach will also strengthen the Vision's separation of different areas of the Borough. In paragraph 9.133 "prevented" should come before "reduce" in the risk hierarchy. We support paragraph 9.134, which clearly sets out the definition of the functional floodplain in Guildford. This paragraph could be expanded to explain the Guildford Policy Unit of the CFMP and why we are taking a different approach to Guildford Town Centre and the Guildford Urban Area. The supporting text should explain the different approach we are taking to the Town Centre and surrounding Guildford Urban Area. The New Evidence includes the risk reduction approach we are working on for the Town Centre and Surrounding Guildford Urban Area. However, from the title of the document it is not clear that the work we are undertaking relates to using development to reduce flood risk in this specific area.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(e.)	Guildford Environmental Forum	Suggest including: "Greenroofs and rainwater harvesting are effective ways to reduce the flood impact of increasingly prevalent heavy rain events. Greenroofs also provide sound and heat insulation and rain harvesting reduces drinking water consumption". Rainwater harvesting should become standard on developments over 5 houses
	(e.)	Shere Parish Council	This is only a grammatical note. The sentence "9.130 There are three main watercourses in Guildford Borough; the River Wey, the River Tillingbourne, and the River Blackwater." should read "...the River Wey, the Tillingbourne, and the River Blackwater." To include 'river' before Tillingbourne is tautological, since it incorporates 'bourne' in its name.
CP23	(a.)	Downsedge Residents' Association	We agree with this important policy.
	(a.)	Guildford Business Forum	GBF supports this policy. We are aware that the Surrey Hills Board has written to Natural England to formally request a boundary review of the AONB. GBF does not support a review which would consider the potential of upgrading areas currently designated as Areas of Great Landscape Value (AGLV) to AONB status. GBF considers policy CP27 to be adequate.
	(a.)	Guildford Cathedral	no comment
	(a.)	Guildford Environmental Forum	We consider that the protection and enhancement of the biodiversity or ecological value of the area should be included in the main text of the policy, not relegated to the supporting text.
	(a.)	Natural England	Natural England strongly support the inclusion of Policy CP23 to conserve and enhance the AONB, and Policy CP27 to consider landscape character. We are pleased to note the landscape character approach, and that reference is given to Landscape Character Assessment (LCA), and the AONB Management Plan. LCAs provide a comprehensive landscape evidence base to underpin planning and management decisions. Policies CP23 and CP27 – The Surrey Hills AONB management plan will help to deliver policy CP23. A baseline Landscape Character Assessment should also be used to measure delivery of these policies.
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	Paragraph 9.137 (page 93) and Paragraph 9.138 (page 93) recognise the difficulties faced within the urban/rural fringe and the fact that a positive approach to development here is called for. This is welcomed and supported. Could be appropriate to undertake an AONB boundary review as part of a wider Green Belt review, looking at the longer term needs of Guildford.
	(a.)	Shere Parish Council	This policy is welcomed and supported, particularly the inclusion of "enhance" as a result of the CROW Act since currently enhancement is only required for the AGLV designation. However: 1. why the distinction between 'conserve or enhance' and 'conserve and enhance' in the first two bullet points; 2. the protection and enhancement of the biodiversity or ecological value of the area should be included in the main text of the policy, not relegated to the supporting text. This would better respect the public response cited.
	(a.)	Surrey County Council	We SUPPORT this policy. However, there are a number of schools in the AONB, and it should be recognised that a village school is the heart of the community, with many villages no longer having shops, post offices, pubs, or other facilities that act as a focus for the community. Development should lead to an enhancement of the viability of educational facilities in rural settings, including villages. We should like refurbishment or development of educational infrastructure to be explicitly included in the 3rd bullet point as an example of necessary development.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Surrey Hills AONB	<p>The Office of the Surrey Hills AONB has some concerns about the wording of Draft Policies CP23 - Surrey Hills AONB and 27-Landscape Character Assessment. In short, Policy CP23 is not clearly expressed, and does not reflect national AONB policy or the Surrey Hills AONB Management Plan Review 2009-2014. The wording of the policy is unusual and weak in that "Development proposalswill have regard to the need to: etc". The policy will be difficult for prospective applicants, the public and planning application decision makers to gauge whether a development proposal is likely to be acceptable or not. It could be all too easy to argue that almost any development proposal "will have regard to:" etc , but that it does not necessarily have to meet the tests listed in the policy. The AONB policies in the Tandridge and Mole Valley Core Strategies are stronger than Guildford's Policy CP23. The first criterion reads "Conserve or enhance the natural beauty". You may like to check this against the first criterion of the Adopted Tandridge Core Strategy Policy CSP20 where the wording is the same except for the use of the word "or". It is noted that the second criterion in CP23 refers to "conserve and enhance" which suggests that the word "or" is a typing error. A small typo, should "Conform to the highest environmental and design standards" be an additional bullet point? It is difficult to understand why there should be different policies for different parts of the Surrey Hills AONB when the considerations should be similar. All 6 constituent local planning authorities have recently adopted the same Surrey Hills AONB Management Plan 2009-2014. It is requested that the policy reflects more closely the wording that Guildford Borough Council and the other 5 constituent authorities have recently adopted in the Management Plan. The combination of Policies CP23 and CP27- Landscape Assessment adds to the confusion. It is suggested that the Council includes a similar approach to that of Mole Valley where all landscape matters are combined into the one policy: in the case of Mole Valley, policy CSD13. Especially since Tandridge's Policy CSP20 has been through public examination your Council is requested in a revised policy to refer to applying the same principles of the AONB to the AGLV and retaining the AGLV until such time as there has been a review of the AONB boundary. Policy CP27 - Landscape Character Assessment refers to landscape and townscape, This is a further confusion for the reader and it is suggested a muddling of the two issues. It might be better to separate out all landscape matters, with AONB, AGLV in one policy and townscape in another.</p>
	(a.)	University of Surrey	<p>The University of Surrey supports this policy which seeks to ensure development proposals within or near to the Surrey Hills AONB conserve or enhance its character and local distinctiveness. The Surrey Hills Board has written to Natural England to formally request a boundary review of the AONB. The University of Surrey however does not support an AONB review which would consider the potential of upgrading areas currently designated as Areas of Great Landscape Value (AGLV) to AONB status. The University considers policy CP27 to be adequate.</p>
	(b.)	Member of the public	<p>Areas of Great Landscape Value (AGLV) are also very important, in particular in protecting views into and from the AONB and in providing supporting scenery to the AONB, towns and villages, and should be included in the Core Strategy. Overlarge houses and house extensions have recently been built in the suburbs of Guildford which have damaged views from the AONB. It would be useful if protection against this happening could be given in the Core Strategy, perhaps in Policy CP16 under 'Context' and/or CP27.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(c.)	Guildford Society	<p>Policies to be replaced by the Core Strategy - The table on pages 121 and 122 of the Consultation states which Local Plan policies it is intended to replace with Core Strategy core policies.</p> <p>RE5: Area of Outstanding Natural Beauty. Replaced by CP23: Surrey Hills AONB. RE5 states ' Development inconsistent with the primary aim of conserving the existing landscape character will not be permitted'. CP23 should contain a similar defensive clause.</p>
	(d.)	CPRE Surrey Branch Guildford	<p>There is we believe an error in the first bullet point which should read "Conserve and enhance..." in an identical manner to bullet point 2, not "conserve or enhance". CPRE is not comfortable with the wording of the third bullet point with its reference to the provision of development. We would like to see CP23 include a statement acknowledging that GBC has adopted the Surrey Hills AONB Management Plan 2009-2014 and is a core funding partner, CP23 should acknowledge that GBC must "have regard" to all the policies in the Surrey Hills AONB Management Plan. The policy should in our opinion refer to the county designation of countryside protection known as "Area of Great Landscape Value"(AGLV). A definition should also be included in the glossary. CP23 does not indicate how important the AONB is to Guildford in that its border stretches right up to the urban built-up fringe of the town, and views from the High Street, the Keep and other prominent buildings in Guildford are largely of AONB land.</p> <p>Would be useful to include a map of the extent of the Surrey Hills AONB and AGLV land in Surrey with the long distance National Trails that run through Guildford District marked. CPRE does not like the wording of the last two sentences in paragraph 9.137. The repetition of the word "sensitive" seems inappropriate. What we would like to see stressed is that "Any development of the rural-urban fringe must take account of the national importance of AONB countryside and ensure that its design and scale does not harm views to and from the AONB and fits in well with the landscape quality of its setting."</p>
	(d.)	Member of the public	<p>The protection and enhancement of the biodiversity or ecological value of the area should be included in the main text of the policy, not relegated to the supporting text.</p>
	(d.)	Member of the public	<p>If economic costs take precedence and environmental costs are ignored the affects of energy use of the new building will not be to mitigate Climate Change but will contribute to greater Climate Change. Suggest as Climate Change will so seriously affect us all, this is an opportunity for all new developments to be required to generate 20% renewable or low-carbon energy.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Surrey Countryside Access Forum	Development proposals within or near to the nationally important Surrey Hills AONB must have regard to the need to: 1. Conserve and where possible, enhance the special landscape character, heritage, distinctiveness and sense of place of the locality; 2. Conserve and enhance important viewpoints and vistas, protect the setting and safeguard views out of and into the AONB; 3. Support suitably located sustainable development necessary to facilitate the environmental, economic and social well being of the AONB and its communities; 4. Promote access to recreation within, and enjoyment of the area; 5. Conform to the highest environmental and design standards; 6. Support and promote positive land management that contributes to the conservation and enhancement of the AONB AGLV Where development is proposed which is within or may affect an Area of Great Landscape Value the developer must demonstrate as part of a planning application that any impact from the development will not impact on the visual quality of the area.
	(e.)	East Horsley Parish Council	Comment applies to EPE 3 and CP23. We would prefer to see more detail on how CP23 will be achieved – some obvious supporting proposals could be added eg use of local building materials, making AONBs more attractive to visit, further restrictions on development in relation to AONBs (size, shape, style) etc
	(e.)	Member of the public	The sentence: “Support provision of suitably located sustainable development necessary to facilitate the environmental, economic and social wellbeing of the AONB” is unclear. It could be interpreted in many ways and lead to inappropriate development in the AONB. It could be argued that inappropriate development is economic, etc. AONB protection policies, which are the same as for a National Park, should be applied and should be stated in this Policy section.
CP24	(a.)	Barton Willmore	We support this policy
	(a.)	CPRE Surrey Branch Guildford	CPRE supports this policy.
	(a.)	Downsedge Residents' Association	Acceptable.
	(a.)	Effingham Parish Council	Effingham Parish Council SUPPORTS this. Effingham Parish Council fully supports the biodiversity policy with regard to Effingham Common.
	(a.)	Guildford Business Forum	GBF supports this policy.
	(a.)	Guildford Cathedral	no comment
	(a.)	Guildford Environmental Forum	(a) This policy is welcomed and supported.
	(a.)	Member of the public	Strategic objective EPE3 should be included in addition to PC3. This policy is welcomed and supported.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Natural England	Natural England strongly support this policy. We are pleased note that our comments on the Preferred Options (June 2006) were taken into consideration. Reference should also be made to protecting and enhancing SPAs in para 9.145, for a more complete list of protected sites, and to compliment policy CP26. We recommend that reference is given, within the policy wording or evidence base, to PPS9 – Biodiversity and Geological Conservation. Policy CP24 – The targets and indicators for this policy should be more detailed. We recommend a target that reflects the Surrey BAP targets. You may wish to refer to BAP priority maps in order to establish a baseline of biodiversity in the area, and to identify opportunity areas.
	(a.)	RSPB	The RSPB is encouraged by the Council's approach to their biodiversity policy. The Council should identify and map conservation sites in a hierarchy of international, national and local designations. In addition, restoration sites should also be presented in mapped format. The enhancement or restoration of habitat should be focused around existing priority habitats to reduce fragmentation and allow the habitats and species that they support space to adapt to climate change. Previously developed land should also be highlighted as an area with potential biodiversity value, which may need safeguarding through planning decisions.
	(a.)	Surrey County Council	Policy CP24 Biodiversity and woodlands, Policy CP25 Countryside and Blackwater Valley Strategic Open Gap, and Policy CP26 TBHSPA. We SUPPORT the objectives towards biodiversity and the protection of sensitive woodlands contained in Policy CP24, and the reference to the Surrey Biodiversity Action Plan. We SUPPORT the objective of mitigating the impact of residential development (and other developments) on sensitive habitats within the TBHSPA, contained in Policy SP26
	(a.)	Surrey Wildlife Trust	Surrey Wildlife Trust welcomes the overall approach of the policy, particularly the recognition that biodiversity is relevant throughout the Borough not just recognised sites.
	(a.)	University of Surrey	The University of Surrey seeks to incorporate theses principles in their day to day management and gives significant consideration to these issues when making decisions concerning the future development of their estate.
	(d.)	East Horsley Parish Council	We would like to see more visible commitment to promoting and enforcing this policy and measures identified to protect local countryside assets from national or regional planning policies which might in future damage them.
	(d.)	Environment Agency	We welcome the inclusion of policies relating to the protection of biodiversity as a whole. We understand that geological features are important to protect, however, this policy relates biodiversity. Paragraph 9.141 refers to Geological Conservation, which does not fit with the remainder of the policy. Paragraphs 9.143-9.144 reference the protection and minimisation of harm to biodiversity. This sends out the wrong message to potential developers, as PPS9 requires the protection and enhancement of biodiversity. The list of features for protection and enhancement should include rivers and watercourses. We are surprised, with the importance the River Wey has been given earlier in the document, that this has not been identified as an area for enhancement and/or protection.
	(d.)	Surrey County Council	Heritage issues-In our view there is insufficient reference to the historic environment throughout the document. PPG16 (paragraph 15) indicates that development plans should include archaeological protection policies. The lack of a dedicated core policy on the historic environment means that, in principle, the Borough Guildford is not in compliance with national government policy. This contrasts with the approach to biodiversity and protection of the natural environment. In our view, the Borough should develop a complementary Historic Environment Core Policy to CP24, developing on the basis of the (not saved) Local Plan 2003 Policy HE11 (Scheduled Ancient Monuments and Other Sites and Monuments of National Importance), and expanding on the existing saved Local Plan policies HE1-10 and HE 12 that relate to the historic environment.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Surrey Wildlife Trust	The text includes a list of updates since the preferred options consultation. Additionally there has been: Biodiversity Duty (2006), updated Surrey SNCI Criteria (2008), DEFRA Local Sites Guidance (2006), Natural England Standing Advice on Ancient Woodland (2009).
	(d.)	Woodland Trust	The Trust is pleased to see this specific policy on Biodiversity and woodlands and that woodlands gets a specific mention. The council should go further in providing explicit protection for ancient woodland and ancient/veteran trees given the amount of this precious habitat that exists in the Borough. This level of protection is supported by Policy NRM5: Woodlands in the Draft South East Plan. We also believe that this policy could be strengthened by including specific wording relating to the need to take a landscape-scale approach in order to help species and habitats adapt to climate change. In particular, we would like to see a commitment to buffering and extending semi-natural woodland sites in order to increase their resilience in the fact of climate change.
	(e.)	Surrey Wildlife Trust	The supporting text should include recognition that conserving biodiversity has direct and significant economic benefits for Guildford. Green Infrastructure has been shown to have considerable economic value in terms of the services provided to the local population. The supporting text should be modified to include the Biodiversity Duty (Section 41 NERC Act), which came into force last year. The Duty requires all public bodies to have regard to biodiversity in all its functions and to take steps to conserve and enhance habitats and species. The list should additionally include BAP priority habitats
CP25	(a.)	Blackwater Valley Friends of the Earth	"Resist unsuitable development..." is too lenient, change wording to "reject unsuitable development..."
	(a.)	CEMEX	CEMEX supports the protection of the countryside from development that would harm the physical and visual separation of settlements, however CEMEX urges the council to consider selected residential development where it adjoins built-up areas and can make a meaningful contribution to the growth and sustainability of village communities
	(a.)	CPRE Surrey Branch Guildford	CPRE supports this policy. We do not find the wording of paragraph 9.150 fully acceptable, We are not convinced that those responsible for the Guildford section of the Blackwater Valley share a comparable vision with other local authorities in the sub-region outside a determination to maintain its environmental quality. CPRE supports the suggestion that the Blackwater Valley Green Corridor should be designated a SANGS.
	(a.)	Downsedge Residents' Association	Acceptable.
	(a.)	Drivers Jonas on behalf of CEMEX	In relation to proposed Policy CP25 'Countryside and the Blackwater Valley Strategic Open Gap', CEMEX urges the Council to consider permitting residential development on selected sites adjoining built-up areas.
	(a.)	Effingham Parish Council	Effingham Parish Council SUPPORTS this. The Parish Council regards this as a very important principle. It must also be clearly stated to apply on the borders of the Borough. For example the countryside between Effingham and Bookham, within Mole Valley, must be preserved.
	(a.)	Environment Agency	We support this policy, in particular the wildlife value and enhancements to access to, and recreational activities along, the Blackwater.
	(a.)	Guildford Business Forum	GBF supports this policy.
	(a.)	Guildford Cathedral	no comment
	(a.)	Guildford Environmental Forum	(a) The policies for the maintenance and enhancement of the wildlife of the countryside and of the Blackwater Valley Gap are welcomed and supported.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Member of the public	The policies for the maintenance and enhancement of the wildlife of the countryside and of the Blackwater Valley Gap are welcomed and supported.
	(a.)	National Trust	This policy refers on the one hand to general principles of countryside protection and on the other, to principles for control of development within the Strategic Open Gap. We consider this is confusing and unclear and whilst we have no problem with the policy content, we suggest that the two matters are dealt with in separate policies.
	(a.)	Natural England	We are pleased to see the inclusion of this policy in the Core Strategy, and reference to Natural England's 'green space' standards. This policy will compliment policies CP5, CP24, and CP26.
	(a.)	Surrey Wildlife Trust	The Trust supports the approach of the policy and the recognition that settlements should be kept separate. The countryside outside the urban areas acts as corridors which are essential in helping biodiversity cope with climate change. They also provide essential green infrastructure and recreational resources. As well as the Blackwater Valley the Trust considers that the countryside between Guildford and Woking should be recognised and enhanced as a strategic gap.
	(e.)	Sport England	In line with the supporting text in paragraph 9.147 Sport England would suggest the inclusion of 'ancillary' within the final bullet point, to read 'Limit development to that facilitating, and/or ancillary to, outdoor recreational open space, agriculture or forestry use'.
CP26	(a.)	Barton Willmore	A complete evidence base is yet to be formulated for Policy CP26. The policy is therefore not 'justified' and is at present 'unsound'. It is noted that the Council are to advance the Strategic Delivery Framework to adoption in Spring 2009, however this is yet to be included in the draft Core Strategy. As drafted, Policy CP26 provides no details of the amount of SANG mitigation which will be required. The Core Strategy and the supporting text to Policy CP26, should identify the broad requirements for SPA avoidance measures and requirements which will be sought from new residential development. This should be subject of independent examination through the DPD process. This detail should be subject to a caveat for any significant amendments made to the TBH Delivery Framework produced by the TBH Joint Strategic Partnership Board. The policy includes no specific detail and only refers to the Council's (Interim) SPA Avoidance Strategy. The Core Strategy should identify those sites which are provided as SANG within the Borough and any within neighbouring authorities that provide appropriate mitigation for areas within Guildford Borough where such mitigation is required. This SANG provision should be included on the Key Diagram.
	(a.)	CPRE Surrey Branch Guildford	CPRE supports this policy.
	(a.)	Downsedge Residents' Association	Acceptable.
	(a.)	Effingham Parish Council	The Parish Council is not convinced that this is a sensible approach. Effingham Common has been designated a SANGS. There are efforts to find land for a car park which would not only have a detrimental impact on Effingham Common, but also be totally ineffective in diverting dog-walkers away from the SPA at Ockham and Wisley Commons.
	(a.)	Guildford Business Forum	GBF supports this policy.
	(a.)	Guildford Cathedral	no comment

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Environmental Forum	This policy is welcomed and supported.
	(a.)	Member of the public	This policy is welcomed and supported.
	(a.)	Natural England	We agree with the approach of this policy regarding the Thames Basin Heaths Special Protection Area. We advise that detailed reference to Special Areas of Conservation (SAC) in general would be better placed in policy CP24, where reference is made to protected sites. Policy CP26 - We recommend that the target for this policy should be more detailed, and state that no development should be approved that would have an adverse impact on the Thames Basin Heaths SPA. Monitoring the increase in residential development within 5km of the SPA, and mitigation for these developments, would be a useful indicator. Monitoring use of SANGS through the Thames Basin Heaths SPA Interim Avoidance Strategy would also be a useful indicator. In terms of recreation, it will be important to have good visitor surveys to inform the assessment of the likely effects of increased recreational pressure arising from the level of growth proposed within the core strategy. Monitoring against baseline population data on notified Annex 1 bird species within the Thames Basin Heaths would also be useful.
	(a.)	Ockham Parish Council	On behalf of Ockham Parish Council CP26 - strongly support. 9.157 Area of Conservation - second bullet - line 1 "significantly"
	(a.)	RSPB	Policy CP26 - The RSPB welcomes the inclusion of a policy within the Core Strategy relating to the TBH SPA. We consider that a number of improvements could be made to strengthen the policy and ensure that the key mitigation measures set out in the endorsed TBH Delivery Framework are clearly explained to the plan reader. We feel that the inclusion of measures to provide protection to Thursley, Ash, Pirbright and Chobham SAC within this policy could lead to confusion. The protection of this site is important and we suggest it is included in a separate policy. 9.152 - We would urge the Council to update their SPA Avoidance Strategy in order to bring it into line with the agreed standards in the TBH Delivery Framework. We are concerned that at this stage the policy and its supporting text do not accurately reflect the full measures set out in the endorsed Framework. We are particularly concerned that the policy does not describe strategic measures set out in the Delivery Framework, like access management and monitoring (wardening), which might be required to mitigate the impacts of recreational disturbance to TBH SPA site. Therefore, it is essential that this (and other measures set out within the Delivery Framework, but not currently contained with Guildford's Interim Avoidance Strategy) is translated into both the Council's updated SPA Avoidance Strategy and the draft Core Strategy. Once the Council has carried out its review and update of its TBH Avoidance Strategy it should not be necessary to refer to both documents within policy CP26 thus avoiding any potential confusion. The Council will have to provide a strong evidence base, which demonstrates that with mitigation measures in place there will be no adverse effect to the TBH SPA sites. It will be essential for the Council to work in collaboration with neighbouring authorities. The Council should ensuring that new development does not impact on the corresponding interests of the Wealden Heaths SPA, the closest part of which lies within 5km of the borough boundary. We are concerned that this important issue has not been considered within the Core Strategy.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>9.153 –The provision of SANGS will be essential in order to offset the increase in recreational disturbance from the provision of new housing in the Core Strategy to TBH SPA. The Council will need to develop a strong evidence base to demonstrate that the proposed SANGS sites provide a functioning replacement to the SPA. To achieve this it will be essential to have baseline visitor data to understand current and future potential pressures on the SPA sites.</p> <p>9.154 -We further note that the TBH Delivery Framework advises that mitigation and avoidance measures be applied to net new units of staff residential accommodation within use Classes C1 and C2, however policy CP26 currently refers only to those within C2. We question the reason for excluding residential accommodation within Use Class C1, which could include permanent residential occupation. In line with the guidance set out within the Delivery Framework (Policy NRM6), we strongly advise the Council to further set out the approach to large residential developments on a case by case basis, for which their own avoidance measures may be necessary.</p>
	(a.)	Surrey Countryside Access Forum	<p>Development proposals for residential development within 5 km of the TBHSPA boundary which either individually, or in combination with other schemes, have an adverse effect on the TBHSPA, will not be permitted unless they include appropriate mitigation for their impact. The detail of the standards of mitigation will be contained in a Supplementary Planning Document. For all other forms of development that are considered to have an adverse effect on the TBH SPA the Borough Council will require mitigation to be provided or contributed, as appropriate.</p> <p>Special Areas of Conservation (SAC) Where development is proposed which is within or may affect the Special Area of Conservation (SAC) the developer must demonstrate as part of a planning application that any impact from the development will not damage the nature conservation value of the Special Area of Conservation.</p>
	(a.)	Surrey Wildlife Trust	<p>Surrey Wildlife Trust supports the inclusion of this policy and notes the the TBH Delivery Framework has recently been agreed and that Guildford's Interim Avoidance Strategy will need to be revised to reflect this.</p>
	(a.)	Wanborough Parish Council	<p>Many of the developments proposed within CP1, CP2 and CP6 fall within the SPA zones and if current difficulties in building new properties and converting existing buildings are continued then the plan will fail. Much of the interpretation of this regulation is within the hands of GBC through the provision of SANGs and development contributions and more positive proposals and interpretations of the SPA wording are required. With a positive, thought-through interpretation of the SPA more can be done to meet the demands for housing, in particularly in the West Guildford areas.</p>
	(c.)	Guildford Society	<p>The table on pages 121 and 122 of the Consultation states which Local Plan policies it is intended to replace with Core Strategy core policies. NE1: Potential SPA's and Candidate SACs, which states that development must not have adverse effects. Replaced by CP26: TBH SPA and SACs, which requires avoidance of adverse effects.</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Barton Willmore	As drafted, Policy CP26 provides no details of the amount of SANG mitigation which will be required. In our view, the Core Strategy, the supporting text to Policy CP26, should identify the broad requirements for SPA avoidance measures and requirements which will be sought from new residential development. This should be subject of independent examination through the DPD process. This detail should be subject to a caveat for any significant amendments made to the Thames Bain Heaths Delivery Framework produced by the TBH Joint Strategic Partnership Board. The policy includes no specific detail and only refers to the Council's (Interim) SPA Avoidance Strategy. The Core Strategy should identify those sites which are provided as SANG within the Borough and any within neighbouring authorities that provide appropriate mitigation for areas within Guildford Borough where such mitigation is required. In this respect, we note that the Council has not yet secured adequate facilities at the Effingham Common SANG in the eastern part of the Borough in order to meet Natural England's requirements standards. If car parking facilities cannot be secured to serve Effingham Common, the capacity of the site to provide SPA mitigation will be in doubt. Other opportunities to deliver SANG in this part of the Borough should be explored and considered favourably.
	(d.)	Member of the public	Protected wildlife in countryside and in SPA areas such as Whitmoor Common will be put at further risk by the higher housing targets proposed in the 'Proposed Changes' to the Draft South East Plan.
	(d.)	SEERA	(e): A cross reference to Policy CP5 should be included. Delivery Framework (b): The submission document will need to clearly set out when and by what means development will be delivered and also what infrastructure is required to support the overall strategy, when it is required, and how it will be delivered.
CP27	(a.)	Abbotswood Residents Association	We fully support this strategy.
	(a.)	CPRE Surrey Branch Guildford	CPRE supports this policy. The reference to the Surrey Hills AONB Management Plan on page 105 should be updated to read "2009-2014" rather than "2004" as shown.
	(a.)	Downsedge Residents' Association	II/111 Text in box. (a) (d) (e) In first paragraph, after "townscape" add "(including suburban)". In third bullet point add references to bulk, height of buildings and gaps between buildings. Otherwise excellent. II/112. Paragraphs 9.158-9.166. In 9.158, first sentence, after "villages" add ",suburbs" .Otherwise excellent.
	(a.)	East Guildford Residents Association	•This policy is fully supported •The Guildford Landscape Character Assessment 2007 document is very important and should be referred to in all relevant planning applications
	(a.)	Effingham Parish Council	Effingham Parish Council SUPPORTS this.
	(a.)	Guildford & Waverley Friends of the Earth	Comment from FoE: As currently drafted, the diehard conservationists are going to use this policy as an argument against any renewables, and certainly all wind turbines. It is unduly restrictive. We note it is a new policy. We see no justification for it and would delete it in its entirety.
	(a.)	Guildford Business Forum	GBF supports this policy.
	(a.)	Guildford Cathedral	The dean and chapter support this policy
	(a.)	Guildford Environmental Forum	The statement "The urban fringe should be conserved intact and, where necessary, be enhanced through appropriate landscape restoration, management and habitat creation" in paragraph 9.166 is welcomed and supported.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Member of the public	The statement “The urban fringe should be conserved intact and, where necessary, be enhanced through appropriate landscape restoration, management and habitat creation” in paragraph 9.166 is welcomed and supported.
	(a.)	Member of the public	Guildford Borough Council had identified the 'garden suburbs' and other roads for special attention in the Landscape Character Assessment, which has now been adopted as Policy CP27. I applaud this work and fully support the policy. In doing so, I acknowledge that the houses so identified are not, in the main, listed and will be altered to meet modern needs by present and future owners. However, this policy draws to their attention, and that of the planners the need to protect the character of these areas, and ensure that they are not over-developed as the demand for housing increases.
	(a.)	Natural England	Natural England strongly support the inclusion of Policy CP23 to conserve and enhance the AONB, and Policy CP27 to consider landscape character. We are pleased to note the landscape character approach, and that reference is given to Landscape Character Assessment (LCA), and the AONB Management Plan. LCAs provide a comprehensive landscape evidence base to underpin planning and management decisions. Policies CP23 and CP27 – The Surrey Hills AONB management plan will help to deliver policy CP23. A baseline Landscape Character Assessment should also be used to measure delivery of these policies.
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	Paragraph 9.158 (page 103) approach is supported. However it should be noted that present policies for the urban/rural fringe around Guildford are not conducive to encouraging any form of development. Following a review of the Green Belt which is necessary in any event, opportunities should be investigated to identify where sensitively designed development can assist in meeting these objectives. Paragraph 9.166 (page 104) stated. Unfortunately the other policies in the strategy will not assist this in that the Green Belt tightly abuts these urban areas with its restrictive policy approach to development, the policy should therefore seek to identify opportunities for sensitively located development in these areas which can improve the setting of the town.
	(a.)	Surrey Countryside Access Forum	Landscape Character Assessment (LCA)-All development proposals should provide positive benefit in terms of landscape and townscape character and local distinctiveness and should have regard to the identified landscape character areas. Development will be expected to: 1. Enhance landscape and townscape character; 2. Adopt appropriate building styles and materials; and 3. Support land management practices that have no adverse impact on characteristic landscape patterns.
	(a.)	University of Surrey	The University of Surrey supports this policy which seeks for all development proposals to have regard to the identified landscape character areas and provide positive benefit in terms of landscape and townscape character and local distinctiveness.
	(d.)	Burpham Community Association.	Greater attention needs to be given to the management of infill and gardengrabbng, particularly where a precedent may be set which over a period of time will lead to a radical change in the nature of a community and a considerable loss of open/living space.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Member of the public	SPDs: - It is disappointing that SPDs such as the Landscape Character Assessment and Residential Design Guide cannot be independently examined and thereby strengthened. However, they are mentioned strongly in the Core Strategy and it is essential that they are incorporated into the Local Development Framework. More emphasis could be given in the Core Strategy to Guildford's topography. Buildings need to be built that are keeping with the town's topography and views and this could be added to CP16 or CP27. More emphasis could be given to Guildford's views – into and from the town and countryside, as well as across the town and countryside. Development within the town can adversely affect the AONB and countryside. This could perhaps be added to Policy CP16 or CP27. The roofscape of Guildford, because of its topography, is very noticeable and contributes to Guildford's scenery. It needs preserving where necessary and enhancing, and this could perhaps be emphasised in Policy CP16 or CP2.
	(e.)	Surrey County Council	a sentence should be inserted here drawing specific reference to listed buildings, parks, gardens and landscapes, drawing attention in particular to the Borough 'List of Scheduled Ancient Monuments, County Sites of Archaeological Importance and Areas of High Archaeological Potential', also the 'Historic Parks and Gardens Summary List' included in the online evidence base supporting the Core Strategy.
Delivery and monitoring	(a.)	Barton Willmore	The Core Strategy makes assumptions for the locations for growth based on the emerging South East Plan housing requirement of a minimum 8,440 houses to 2026 (422 dwellings per annum). This has been made without key background evidence reports in place including a Strategic Housing Land Availability Assessment (SHLAA), an updated Sustainability Appraisal and the Green Belt and Countryside Study. The evidence in the SHLAA (anticipated July/August 2009) alongside the Strategic Housing Market Assessment (SHMA), completed February 2009, are key to devising the spatial vision for Guildford Borough.
	(a.)	Downsedge Residents' Association	If regional planning is abandoned all references to the South East Plan should be removed. CP 1- Acceptable. First bullet point: add “approvals” (source: planning applications and appeals decided). second bullet point: Acceptable. CP 2-Target-Rewrite to conform to the revised policy CP 2. Indicators-Replace “identified sub-regions” in second bullet point with “wards”. In both bullet points add “approvals (source: planning applications and appeals decided). Otherwise acceptable CP 3-Target-Delete all after “locations”, Indicators-Existing bullet points acceptable CP 4-Retail hierarchy and town centre uses Target-First bullet point acceptable. Reword second bullet point to “encourage” rather than “direct”. New bullet point needed “to help retailers adjust to new patterns of trading (especially by the Internet)”. Indicators-Existing indicators acceptable. New indicator needed; suggest “Approximate volume and value of sales switching to Internet purchasing”

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
			<p>CP 5-Target-Acceptable. Indicator-Indicators for the different types of Infrastructure (e.g. as listed in paragraph 9.34) should be set.</p> <p>CP 6- Land-use planning and movement Target and Indicators (a) Acceptable.</p> <p>CP 7-Target-Acceptable. Indicators-Bullet point 1: Acceptable. New bullet point: “The use of cycle routes in Guildford Borough. Bullet point 2 add “and their size and usage”.</p> <p>CP 8-Target-Acceptable. Indicators-Existing three bullet points: Acceptable. Suggest two new bullet points “Provision and take up of complementary ticketing” and “Usage of Park and Ride facilities”.</p> <p>CP 9-Target-After “regard” add “as appropriate”. Indicators-Existing bullet points Acceptable. Add new Indicator: “Number of changes made in Policy or Consultation Document as a result of consultation”.</p> <p>CP 10-Target-Replace “homes for all” with “a range of dwellings of different types and sizes” Indicators-Delete first bullet point (it is repeated in CP 12 where it belongs). In the second bullet point (b) after “tenures” add “,and numbers of each type/size” Third bullet point: Move to CP 12.</p> <p>CP 11-Target-Delete all after “densities”. Indicators-In first bullet point add something on the lines of “and the number of dwellings in each density category”. Second bullet point acceptable.</p> <p>CP 12-Target-Replace all wording after “2026” with something on the lines of “with a yearly average calculated according to measures for the provision of affordable homes then applicable”. Indicators-Existing bullet points acceptable. Add the third bullet point in CP10 as a new bullet point here.</p> <p>CP 13 to CP 19 Targets and Indicators-All acceptable for these CPs.</p> <p>CP 20-Target-Acceptable. Indicators-First three bullet points acceptable. In fourth bullet point delete all after “works”.</p> <p>CP 21-Target-Acceptable. Indicator-Although the existing bullet point is acceptable it is not an adequate indicator for this policy. We are unable to suggest another indicator, but experts in this field could probably do so.</p> <p>CP 22 to CP 27 Targets and Indicators-All acceptable for these CPs.</p>
	(a.)	Government Office for the South East	<ul style="list-style-type: none"> • Highlight any risks to delivery. • Monitor the objectives to be delivered not policies. Monitoring needs to be developed and integrated further into the strategy. For example cross-referencing of policies and objectives. • Consider reducing and focusing objectives to ensure these drive the plan. The structure of three overarching sustainability themes, each with its own objectives is a good starting point. Alternatively consider drawing together place-based themes informed by the area visions. Discussed other LPA examples.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Guildford Business Forum	GBF broadly supports the approach being taken by the local planning authority, but would urge that close attention is paid to the issue of allocating public funding to existing infrastructure deficiencies which affect the efficient and effective functioning of the Town Centre and Urban Area.
	(a.)	Guildford Cathedral	The dean and chapter support the approach being taken by the local planning authority.
	(a.)	Guildford Society	We agree that the delivery and monitoring of the core strategy, as specified in section 10 of the Consultation, are essential to its success.
	(a.)	Highways Agency	The HA supports the use of the Infrastructure SPD to ensure the timely delivering of the infrastructure needed to support development. The HA believes that the delivery and monitoring framework will assist identifying land for housing supply and any problems associated with this such as an insufficient supply of land. The HA wishes to be involved in the consultation process
	(a.)	Natural England	We agree that it is important that targets are set and implementation and monitoring mechanisms are in place for each policy, to ensure that they are being implemented. Some of the targets and indicators suggested in the delivery and monitoring framework should be more detailed. Targets need to be clear, with more specific indicators and measured against baseline evidence
	(a.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	Paragraph 10.1 (page 106) refers to “shaping what happens locally in the plan period to 2026.” This however is an inaccurate representation of the time period which the strategy needs to consider, as any essential Green Belt review will need to look further ahead. Paragraph 10.8 stated. Whilst the principle of working together with landowners and developers to produce development briefs for sites is not disputed, the strategy fails at the moment to address long-term development needs which will not allow such an approach to be effective. Paragraph 10.14 (page 107) stated. There is no evidence to demonstrate within the Core Strategy that sufficient land can be accommodated to meet housing requirements in accordance with guidance in PPS3 or the evidence base.
	(a.)	Sport England	Polices CP17, 18 and 19 – It appears that a number of proposed indicators for these policies are of relevance to more than the individual policy they are included within i.e. number of new developments providing open space and the provision of new leisure and cultural facilities in the Borough. It is suggested that the Borough could usefully highlight those indicators which could relate to more than one individual policy.
	(a.)	Surrey County Council	The current introduction has been abbreviated and only refers to the Core Strategy as an element of the Guildford Development Framework (GDF). Paragraph 10.1 on implementation of the Core Strategy makes no reference to the role of Waste and Minerals Plans as part of the statutory development plan for the area, mentioning only the GDF and the regional strategy. This position needs to be corrected by inserting an explanation of the County’s role as the Minerals and Waste Planning Authority, its requirement to produce an MWDF, the proposals of which are required to be shown on the Guildford Proposals Map, once adopted.
	(a.)	University of Surrey	Close attention should be paid to the issue of matching public funding to existing and long standing infrastructure deficiencies which affect the efficient and effective functioning of important economic drivers
	(b.)	Guildford & Waverley Friends of the Earth	Indicators for CP11 – what is an appropriate density? The Government gives you target density. Your own target should say.
	(b.)	Guildford & Waverley Friends of the Earth	Target and indicator for CP27. If the indicator is the number of planning applications refused on this basis very little is going to get built and a combination of this policy, the application of this policy and local residents is going to result in a hostile and negative environment for planning. Delete in its entirety.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(b.)	Guildford & Waverley Friends of the Earth	Target and Indicators for CP21. We think this needs to be completely redrafted. In particular we don't understand the target in particular. It is vague. You have European and national targets for renewables, you have NI186. The target should say what this "valuable and considerable" contribution amounts to - 10 or 50% of the energy needs? In relation to the waste target, providing that a new policy is included, there should be something on the slowing down of the waste arising rate of increase per year per person and then a reduction target. Similarly, on households benefitting from bring banks and extended kerbside services including kitchen waste.
	(b.)	Guildford & Waverley Friends of the Earth	Indicators for CP10 – you have a 100% target of providing homes for all in local need. How are you going to measure this?
	(b.)	Guildford & Waverley Friends of the Earth	Indicators for CP17: a recurring theme is our concern for the population living in existing dwellings, and population as a whole? Should this indicator rather be something linked to NHS statistics (clinical obesity, asthma, allergy sufferers, depression)?
	(b.)	Guildford & Waverley Friends of the Earth	Indicators for CP6: indicator: mix use development could include warehousing/offices/non-essential retail units (see the village of Compton: two antiques shops, an art shop/gallery, a pub and not a single place where to buy some bread or milk!). We suggest this policy is slightly in conflict with policy CP4, which aims to direct and concentrate new retail space in Guildford town centre or other existing retail centres.
	(b.)	Guildford & Waverley Friends of the Earth	Indicators for CP5:- indicator the indicator should have a timing element in it, the target being to have the infrastructure in place prior to occupation in cases of certain infrastructure e.g. transport
	(b.)	Guildford & Waverley Friends of the Earth	Target and indicators for CP8 Integrated transport Target: To achieve an integrated transport system in Guildford Borough. Indicators: • The provision of transport interchanges, allowing ease of movement from one form of transport to another. • The provision of suitable safe drop off points and cycle storage at bus and train stations. • Number of pedestrian maps at key locations
	(b.)	Guildford & Waverley Friends of the Earth	The majority of those of us working on preparing this response for Foe were unable to understand these and in our view they need clarification. Locations have been defined and set in a hierarchy under CP1 (hopefully on the basis of their proximity to major services but it isn't stated). First indicator - if something is developed and built (first indicator accounts for completions, not applications for) in a non-sustainable area of the borough -whatever that is- what are GBC going to do about it? Second indicator: hopefully major developments will not be allowed in areas far away from services. However, what is the maximum distance from services qualifying a development as in a sustainable area of the borough?
	(b.)	Guildford & Waverley Friends of the Earth	Indicators for CP9: Consultations are a requirement of the planning system particularly in relation to DPDs and SPDs so we object to their use as indicator
	(b.)	Guildford & Waverley Friends of the Earth	Indicators: We think a new indicator is required • The length of new pedestrian and cycle routes in Guildford Borough. • The number of car clubs operating within Guildford Borough. • Number of people cycling at key survey locations This is needed as an indicator because the length of new pedestrian and cycle routes is not an adequate indicator to assess levels of walking and cycling. In addition, we recommend cycle loops are installed at key locations to monitor cyclist numbers around the Borough.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Abbotswood Residents Association	The delivery and Monitoring Framework. Policy CP6. Should this not include delivery by the Highways Agency concerning essential improvements to the A3 to reduce traffic flows through Guildford and respond to noise pollution from the A3?
	(d.)	Environment Agency	<p>Policy CP5-How will the selected indicator be measured? This appears to be rather vague. Suggested Indicators:</p> <ul style="list-style-type: none"> •Number of applications including SUDS •Number of contaminated sites remediated and put back into use •Number of pollution incidents (from sewage treatment works?)? (could show how well the infrastructure is working) •Water quality of rivers in the Borough (showing changes from adequate infrastructure provision) <p>Policy CP20-Suggested Indicators:</p> <ul style="list-style-type: none"> •Number of Site Waste Management Plans submitted •Number of applications achieving CSH level 4 for water efficiency •Number of applications including SUDS <p>Policy CP22-Suggested Indicators:</p> <ul style="list-style-type: none"> •Number of applications including SUDS •The location of planning permissions for major development permissions in relation to identified areas of flood risk (as shown in the SFRA) •The number of properties at risk from flooding <p>Policy CP24-Suggested Indicators:</p> <ul style="list-style-type: none"> •Number of conditions securing natural buffer zones adjacent to watercourses
	(d.)	Environment Agency	It is unclear, from the delivery section of the document, when, where and who will deliver the objectives. Much of this relates back to the policies themselves, or to SPD's. It would be worth discussing this section further. Additionally, could you confirm whether the Infrastructure SPD is to be updated, or whether you are relying on the document adopted in 2006?
	(d.)	Guildford & Waverley Friends of the Earth	Most of the targets and indicators do not feel very measurable; few have a specific quantitative target (say: 90% of major new developments to be within 800m of a bus stop or a train station) but rather a very vague aim – hence the indicators make little sense in many cases. If this is for monitoring the success of the policies, there is a need for clearer target settings – indicators follow from that.
	(d.)	Highways Agency	<p>The HA believes that CP1, 5, 7 and 8 should also be included as the delivery mechanisms for strategic objective MSG4. This will support reducing the need to travel by car and ensuring development is directed to the areas most easily served by public transport. The HA suggests that traffic related indicators in the SA could include the following: -</p> <ul style="list-style-type: none"> •The proportion of trips by non car modes; •The proportion of new development which is meeting its travel plan objectives; and •The level of growth of traffic on key routes within Guildford Borough

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	Surrey County Council	Policy CP3 Supporting the local economy appears very quantitative, and makes no reference to qualitative measures and types of provision being made, including waste treatment. The delivery section should also refer to joint working with the waste planning authority/local business community on relevant issues. Policy CP21 is not clear on how monitoring the number of large developments permitted will give any meaningful data. The delivery section makes no mention of relevant draft SE Plan waste policies.
	(d.)	Woodland Trust	Policy CP24 - We would like to see the council do more to ensure the woodland element of this policy is monitored. In order to do so we believe it is essential that there are accurate records of the existing resource of ancient woodland and ancient trees in the Borough. We, therefore, suggest that the council undertakes to update the Ancient Woodland Inventory to include wood pasture and parkland and woods under 2ha. We would also like to see the council auditing fully the ancient tree resource (since at present we only have information on sites with ten ancient trees or more). We believe that there will be other important ancient trees scattered throughout the district which should be given protection.
	(e.)	Ockham Parish Council	10.12 - First, you have already defined "AMR" in 10.3 so it is unnecessary to define again. Respectfully suggest you omit the last two sentences. It seemed to us that they are only repeating in rather jargon terms what has already been said that the purpose of the AMR is to monitor implementation of the policies etc.
	(e.)	RSPB	Policy CP24 – Indicators To help monitor the delivery of biodiversity objectives in the Core Strategy we suggest the following additional indicators;• Condition of designated sites (SSSI) • Area (ha) of BAP priority habitat within the Borough • Area (ha) of habitats identified for restoration/ enhancement
	(e.)	Sport England	Policy CP6 - It is suggested that in line with the supporting text to the policy (paragraph 9.45) community facilities (i.e. open space, sport and recreational facilities) should be added to the list of provision included within the second indicator.
Any other relevant comments	(a.)	Abbotswood Residents Association	Apart from the comment on page 3, the document assumes that the content of the final plan will be unchanged from the proposals in the draft plan. A substantial number of Guildford residents responded in the SEP consultation against the plan. Their concerns were not just about the absolute number of houses to be built but also about the removal of the strategy to close the strategic gap between Guildford and Woking and the need for housing development in Guildford to focus primarily on the needs of Guildford residents, and not for migration from outside the region. Should the plan be amended for Guildford as a result of the consultation, then all references to the SE Plan in the Core Strategy will need to be amended. The environment is changing rapidly and we would suggest that more analysis of risk is required in the plan and as to how the plan will adapt to these. The plan and targets amended depending on how the economic situation develops in the light of the current economic climate. The plan contains some risk analysis (e.g. reviewing the Green Belt if not enough housing places can be found in urban centres), and we believe it should also contain a risk analysis to cover shortfalls in other assumptions. In general we note that the paper give less recognition to noise pollution (mainly from traffic) as compared to other forms of pollution. We suggest that this imbalance should be corrected and make some suggestions to this effect in our detailed comments.
	(a.)	Abbotswood Residents Association	We appreciate the arrangements made by the Council to allow a response by different means. This compares very favourably with the arrangements made for the consultation on the Draft South East Plan.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Barton Willmore	Our principal concern is that there is insufficient evidence presented by the Council at this stage to demonstrate that there are sufficient sites to meet the housing requirement. We support the Council in completing a review of the Green Belt through the Green Belt and Countryside Study and expect the result to inform the Pre-submission document.
	(a.)	Barton Willmore	Key diagram - We support the identification of the individual TBHSPA within the Borough. For greater clarity the Key Diagram should also indicate the 400m and 5km zones where specific mitigation (i.e. provision of SANG) will be required. Other specific alternations should be made to the Key Diagram to be included in the Pre-submission Core Strategy. These include: An additional tier in the settlement hierarchy should be provided which reflects the higher order status of East Horsley. ii. The identification of specific locations where a review of Green Belt boundaries is to take place through the Site Allocations DPD (and/or the Core Strategy if appropriate).
	(a.)	Barton Willmore	The inclusion of the designation of 'Countryside Beyond the Green Belt' to the east, south east and south of Ash and Tongham is supported.
	(a.)	Barton Willmore	The final Core Strategy should include a Key Diagram with an Ordnance Survey (OS) base to more easily identify the extent of designations.
	(a.)	Burpham Community Association.	Helpful overview. More should be done to allow members of the public to take part in the consultation process. The documents are difficult to manage on-line. Hard copies were not easy to obtain and it is not realistic to expect people to be able to respond to them from a council office. The website is not easy to use for the response procedure. There was comparatively little publicity to alert the public of the importance of this document.
	(a.)	CABE	Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frameworks to site-specific scales. Local planning authorities' officers and members should champion good design. Treat design as a cross-cutting issue – consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm. Design should reflect understanding of local context, character and aspirations. You should include adequate wording that relates to other design tools and guides.
	(a.)	CPRE	CPRE provided a brief summary of their thoughts and submitted a fuller submission at a later date. The main theme throughout their initial submission was the concern for the timing of the CS document, and asked if was capable of coping with future changes not foreseen when the LDD process started.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Cranleigh Road Area Residents Association	<p>In many respects the draft Core Strategy sets out a sound set of principles for the development of the Borough, but it is still bedevilled by the external inputs from the draft SE Plan. Designations such as "regional hub" are not supported by the local populace. More affordable housing is needed, and people are not against development, but not at the expense of the character of the town and the surrounding landscape. The Council should resist the impositions being imposed on the Borough by the draft SE Plan particularly with respect to unrealistic growth estimates and housing targets. Housing targets have no place in the Core Strategy document and should be removed. Targets and implementation plans will change; the principles of the Core Strategy should stand the test of time.</p> <p>We disagree with the status of regional hub being attached to the whole of the Guildford Urban Area. We believe strongly that the qualities of a regional hub should be restricted to Guildford Town Centre and specific allocated sites e.g. Slyfield – not the Guildford Urban Area as a whole. It is essential that the relevant policies of the Local Plan, together with the Residential Design Guide, be carried over into the new Guildford Development Framework.</p>
	(a.)	Cranleigh Road Area Residents Association	<p>There are many policies within the current 2003 Local Plan that are yet to be reviewed for later inclusion within the Guildford Development Framework. We believe this to be fundamental to the continuing sound functioning of the planning process within the Borough.</p>
	(a.)	Downsedge Residents' Association	<p>We have not commented on the tables following each section as these are largely factual. However references to the South East Plan and other aspects of regional planning will be redundant if regional planning is abolished</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Downsedge Residents' Association	<p>1/3. The Consultation document has been written as things are. It is not 'future proof'. The most likely future scenarios are:</p> <ul style="list-style-type: none"> •A change of government in 2010 •A prolonged recession •Greater use of IT in homes and working life. <p>Effect on the Core Policies in the Consultation Document</p> <p>Much of the wording of many of the core policies remains valid even if the above scenarios actually happen, and in others the wording could be amended slightly to remain valid. So a lot of the effort put into producing and consulting on the core policies will not have been wasted, but there will be risks for wording relating to regional plans, employment forecasts, retail space, housing targets, density, hubs etc.</p> <p>Other general comments on proposed Core Policies</p> <p>There should be explicit reference to Guildford's hilly topography and the effect that has on walking, cycling and access to and from buses. There should also be explicit reference of the value of, and the need to protect, the garden suburbs; this could be inferred from the wording of some policies but would be better if made explicit. The existing infrastructure deficit should be spelled out, not just implied, although there is a reference to a study in paragraph 9.38. It would be sensible to recognise that low investment in infrastructure will inhibit growth. There is an anti-car tone to much of the wording, making car ownership and use sound as deplorable as smoking.</p> <p>Given the importance of the text of the Core Policies, and to a lesser extent the supporting texts, careful attention to the wording is vital. Wording such as "directing development" or "allocate development sites" suggest a degree of proactivity on the part of the Council that is unlikely to be politically acceptable. Wording such as "under-utilised land", "most efficient use of land", "best use of land" can be interpreted as requiring the maximum densities and thus encouraging neighbourhood destroying development. We doubt whether the sequential and hierarchical procedures in policies CP1, CP14, CP15 and CP22 are workable.</p> <p>There should be a recognition that Guildford will be affected by future developments in nearby areas, such as decisions on the future of Heathrow and Gatwick, the inauguration (planned for 2011) of the South Downs National Park, the creation of the new town at Borden/Whitehill, which is likely to go forward, the conversion of Aldershot from a military town to a major centre of population.</p>
	(a.)	Downsedge Residents' Association	Summary of there analysis methods
	(a.)	East Guildford Residents Association	<p>SE Plan – Many aspects are opposed by GBC and the plan is not adopted by Government. There is considerable emphasis throughout the document on this un-adopted SE Plan. There has been considerable opposition by residents of the town (and by GBC) on a number of aspects of the SE Plan including the 422 pa dwellings required of Guildford. As at the consultation date, it is inappropriate for this target (amongst other areas of opposition) to be given the status of a requirement. Guildford Town Centre – a precise definition of 'Guildford Town Centre' is not apparent in the consultation document. This is a matter about which concerns have been expressed; as differing policies can apply to each (eg town centre is described in the SE Plan as a 'centre for significant change' whereas the Urban Area is not). Please can this definition be clarified and full consultation on the implications be made.</p>
	(a.)	Environment Agency	<p>We welcome the settlement hierarchy. The early sections of the document do not refer to flood risk. The inclusion of additional biodiversity policies is welcomed. No longer any reference to SUDS, which should be included. Sustainable development is not only related to Carbon Emissions. Water quality/land contamination is missing. Seek clarification on the delivery strategy. Will the SA be revised for this iteration of the Core Strategy?</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Government Office for the South East	The Core Strategy (CS) consultation document is long, containing much information; this can make it difficult for the public to access. Agreed additional cross referencing to evidence base and SA/SEA would be helpful. Acknowledge that some evidence base is still in progress. Core policies are only required if needed to support the strategy's planned outcomes. Agreed to liaise to agree a note of the key points to inform progress of the Core Strategy and GOSE will continue to engage with Council officers on the key points raised as the Core Strategy is progressed.
	(a.)	Guildford Cathedral	The dean and chapter support this preferred spatial approach set out by the key diagram.
	(a.)	Guildford Society	The heading states that "we anticipate" they "will be reviewed and replaced through a later document of the Guildford Development Framework". Many of these policies are essential to the amenity of the town wellbeing of its residents. We recommend that (a) the "document" is named so that it is clear where these policies will be replaced (b) the word "anticipate" is removed: there should be an unequivocal commitment to review and replacement of the policies.
	(a.)	Guildford Society	Policies not Saved - Page 126 of the Consultation lists seven Policies that 'were not saved for future use', and hence will not be replaced: S1: Major New Retail Development, which specifies the sequential approach and sets out conditions. CP4: Retail Hierarchy and Town Centre Uses forbids major new retail outside the town centre except on sites allocated by the Site Allocations SPD. We note that the Site Allocations SPD is referred to several times in the Core Strategy and places obligations on the SPD to identify the needs for land for various purposes, here for land for out of town major retail. The Core strategy should make it clear that the Site Allocations SPD will contain estimates of the needs for land or for sites for the major categories of use. Similar comments apply to the Town Centre Area Action Plan. RE7: No comment. HE11: We do not understand why this has not been carried in to the Core Strategy. It appears to be a serious omission in Theme 3. We recommend that HE11 be saved. GT4: Proposal Site Seaboard Site, Woodbridge Road, Guildford. This site has now been developed. U1: Proposal Site University of Surrey. Outline planning permission and some detailed reserved matters permissions have been given for this site and much development is now under way. The development is a significant component of the total amount of development in the Borough. We recommend that U1 be replaced by a new CP which asks the University to pay special respect to its surroundings when developing its sites.
	(a.)	Guildford Society	A comment we can make at this stage is that an index of all the documents referred in the text with an indication, where necessary, of where one can find them, would be very welcome. Some of them are so important, for instance the Strategic Land Availability Assessment, that their planned publication date should also be given.
	(a.)	Guildford Society	Key diagram: Borough Map-Delete demarcation of regional hub, Break down urban area into landscape character areas and explicitly recognise distinctive "urban and suburban communities". Town Centre Map-Diagrammatic representation is inadequate. Need to clarify whether the definitive map is this one or the more detailed map in the TCAAP. We are concerned at proposed extent of town centre to NE.
	(a.)	Highways Agency	Notwithstanding these two future schemes there is still a need for further measures to reduce car based travel and increase sustainable travel options and we would look to the Guildford BC LDF to promote and encourage these. All transport interventions, whether delivered by the HA, SCC or through the Guildford LDF need to form a single cohesive, integrated transport strategy for Guildford Borough.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Holy Trinity Amenity Group	There appears to be no default mechanism to an "approval" response if questions are not answered. So all 5 questions have to be answered for each topic. Unless they are it will not be possible to get an overall approval rating for the strategy - and we seem to be encouraged to do this. The respondent encountered technical difficulties in submitting responses online and he made suggestions for the improvement of the submission process.
	(a.)	Home Builders Federation	On page 3 the Council document their continued resistance to additional housing provision through the draft South East Plan yet accept that they have a continued and increasing affordable housing problem. These two issues are linked. If the Council wish to address the issue of affordability of housing within the Borough they should examine the relationship between supply and demand and its effect on house prices rather than constantly seeking to reduce overall housing supply yet increase supply of affordable housing.
	(a.)	King Sturge LLP	Representations have previously been submitted to Guildford Borough Council with regard to earlier consultation documents, and this current submission builds upon the issues raised at earlier consultation stages.
	(a.)	Member of the public	I cannot see what is to happen to the Bus Station. Surely there should be a plan to move it to be close to the Railway station? Making the experience of travelling by bus, whether from Park & Ride sites, or local buses, a more pleasant experience than it is at present should be at the heart of your plans to move cars away from the city centre and encourage the use of public/group transport. I also hope that you will build accommodation suitable for the elderly in the outer reaches of the Borough, with a good bus service to the centre, for the people who will presumably be moved from Victoria Court.
	(a.)	Member of the public	The core strategy document to be too large and too complicated to be reviewed by the layman - this should have been presented through formal meetings and discussions to the general public.
	(a.)	Member of the public	I strongly recommend an executive summary which I for one would welcome.
	(a.)	Member of the public	responded offered their services if required in regards to geological surveying.
	(a.)	Member of the public	The document is too long and references other documents which need to be read, unrealistic to expect people with jobs to spare time to fully digest the document, more time needed for consultation.
	(a.)	Member of the public	I fully appreciate the way that the document has been constructed, the clarity is excellent. I acknowledge that the wealth of attractive features in Guildford and the surrounding area has been acknowledge, and the document sets about trying to protect and enhance these.
	(a.)	Mount Green HA	Having read your Core Strategy document we would like to congratulate GBC for a very well put together document which addresses all of the key issues, including, Of particular interest to MGHA, housing and sustainability
	(a.)	National Trust	As a general point we find the Core Strategy somewhat lengthy and repetitive. The inclusion of Area Visions and Themes as well as Objectives and Policies, is, in our opinion, rather cumbersome and unnecessarily confusing. As the planning system itself is becoming increasingly complex we would urge for greater simplicity and clarity in the plan and its presentation.
	(a.)	Natural England	We would welcome an overarching policy within the Core Strategy which sets out how climate change can be tackled at a local level. Habitats Regulations Assessment (HRA), The HRA is an essential and integral part of the development of local development documents. We are pleased that the HRA process was embarked upon early on.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Ockham Parish Council	Congratulations on the document which on the whole we found helpful and clear and which broadly we support. That said, without wishing to appear too picky, could the final version be reviewed to remove as much as possible of the remaining fashionable, but meaningless, jargon and the various typos.
	(a.)	Ripley Parish Council	Ripley Parish Council has considered the draft document which is under consultation at present. The council have no comments to make in relation to specific policies but would like to make the following comment. The Core Strategy is very long and appears to be repetitive which makes it seem inaccessible to the average person in Ripley. Some Ripley parish councillors recently attended a community assembly with the LSP executive and found this helpful as a forum for putting forward the views of the rural areas of the borough. The PC would like more meetings like this to help them communicate their thoughts
	(a.)	SEERA	The final version of the South East Plan is due to be published shortly, and the policies and proposals in the Core Strategy will need to be in general conformity with the adopted Plan. We generally support the overall strategic objectives and policy approaches set out in the document.
	(a.)	Send Parish Council	The Core Strategy appraisal is supported by Send Parish Council. However we should re-emphasize our wish to retain in its entirety, the Green Belt around our rural village, to contain housing development to low rise accommodation only and for this to be restricted within the existing village envelope and to seek no extension to the light industrial zoning within the area so that we may maintain the character of Send as a village and as a separate entity within the Green Belt.
	(a.)	Solum Regeneration Partnership	Guildford Town Centre map We support this plan.
	(a.)	Sport England	It is noted that page 122 and 125 of the Core Strategy Further Options document indicates that Local Plan policies R1 and R5 will be reviewed and replaced through a later document of the Guildford Development Framework. As you will be aware Sport England is a statutory consultee on any planning application affecting playing field land. It is Sport England's position to oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of five specific circumstances applies. Sport England published its new strategy in June 2008. The strategy is available on their website. The guidance available to local authorities includes checklists to ensure sport is afforded appropriate representation within LDF's and to provide assistance to Local Authorities in developing their approaches and related documents. Respondent provided a checklist for LA's to use to check whether the CS matches their aims.
	(a.)	St Catherine's Village Association	We appreciate you have taken the South East Plan and worked to make it more directly relevant to Guildford. We are concerned that over-ambitious forecasts of economic growth built into the Plan have been retained. The effect of the economic crisis has not been taken into account and demand for new development is likely to be less that expected by the SE Plan. Guildford has significant natural and man-made barriers to transport. Without further infrastructure support these barriers will cause even grater levels of congestion that currently experienced. We strongly support efforts you have made to improve the River Wey frontage and improved its standing in the town. We are disappointed that this policy does not feature more in you Core Strategy. We recognise you are concerned to help Guildford reduce carbon emissions but we are surprised that the policy is not more fully defined in your Core Strategy.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(a.)	Surrey County Council	We advised that the Core Strategy should make it clear in text that the County Council, as Minerals and Waste Authority, will engage with the Borough Council over proposals for future mineral working and restoration, and improved waste handling facilities for the Borough. We also indicated that there should be reference to the County's production of the Surrey Minerals and Waste Framework, and the second Surrey Local Transport Plan 2006/07-2010/11.
	(a.)	Surrey County Council	The County have responded previously to consultations on the Borough's SHLAA process and Sites Allocation DPD and have supplied a list of County-owned sites with potential for further service and other development.
	(a.)	The Clandon Society	We have found the document difficult to understand and the online method of responding too complex. This Core Strategy consultation document does in some way present similar problems to those encountered when responding to the South East Plan Proposed Amendment consultation which was also very complicated.
	(a.)	The Coal Authority	Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.
	(a.)	The Planning Bureau Ltd.	There is an expectation that local planning authorities will develop strategic policies to address the housing needs of local communities, including mainstreaming the profile of older people as part of their approach to planning for housing.
	(a.)	The Planning Bureau Ltd.	The growth in numbers and in the number of pensioners households will have implications for housing need in the Borough over the plan period of the Core Strategy.
	(a.)	The Theatres Trust	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate policies relating to cultural facilities.
	(a.)	Trustees of the Rundle Brendon Will Trust	We submit that by selective omissions in some important matters the document is distorted and thereby fails to comply fully with the South East Plan. Corrective amendment is required.
	(a.)	University of Surrey	The University considers that the key diagram does not adequately recognise the potential for green belt review to release land for new development to meet Guildford's needs.
	(a.)	Wilmslow owners of the Friary shopping centre	It is important that the strategic importance of the Friary site is acknowledged in the Core Strategy and is taken forward in conjunction with the planning of the town centre as a whole. It is vital that a scheme is economically sustainable and a number of options are being considered including one with a major anchor tenant. It is vital that the planning policy in the Core Strategy recognises the importance of the site and provides the right context for proposals to come forward.
	(b.)	CPRE Surrey Branch Guildford	"indicative" policies given in the document entitled Preferred Options 2006 have now been redefined as "Core Policies" and are substantially altered.
	(b.)	Guildford Environmental Forum	We feel that there should be a separate policy for climate change.
	(b.)	Member of the public	Concerned that the Draft Core Strategy incorporates the 'Proposed Changes' to the Draft South East Plan, particularly the higher housing targets proposed, Guildford as a growth area within the London Fringe, and as Regional Hub with a town centre designated as a Centre for Significant Change. All these proposals were strongly opposed by Guildford Borough Council and their inclusion undermines their opposition. The South East Plan is still a draft plan and the 'Proposed Changes' only recently went through the consultation phase. It should be made clear in the wording of the Core Strategy that the 'Proposed Changes' have not yet been implemented.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(b.)	The Clandon Society	Has the Core Strategy considered sufficiently the close proximity of Woking and plans to make it a regional hub? A problem with the South East Plan is that it nominates both Woking and Guildford as regional hubs. They are too close together for this purpose. The two towns could end up in unnecessary competition with each other and lead to unneeded development.
	(c.)	English Heritage	PPS1 makes particular reference to protecting and enhancing the natural, built and historic environment as part of a sustainable approach to planning for the future need of areas. It is disappointing to find that the Council's policies under Theme 3 – Environmental Protection and Enhancement, make no specific provision for the historic environment, despite strategic objective EPE4. We look to the Submitted Core Strategy to provide overarching policy guidance on protection, and where appropriate, enhancement of the historic environment, having regard to local circumstances. We note that the Site Allocations DPD Issues and Options Initial Sustainability Appraisal Report suggests at para 3.1.50 that at this stage, the effect on the historic environment is assessed to be significant as there is potential for a high proportion of the sites put forward impacting negatively on the historic environment, in particular the SAM's, listed buildings and conservation areas. This reinforces the need for appropriate policy in the development plan to minimise the risk to the historic environment that is not provided by policies dealing with more general character.
	(c.)	RPS on behalf of Surrey Police Authority, College of Law and Artington Court	The Key diagram fails to reflect the needs of the Borough to identify strategic development sites outside of Guildford Town Centre. This contradicts the needs of the Council's own evidence base.
	(d.)	Abbotswood Residents Association	Definition of Infrastructure. We suggest you include Public Houses in this definition because of their importance to local communities. If not included here then their importance in providing meeting places should be brought out elsewhere in the plan

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	CPRE	<p>Omissions+Objectives - CPRE believes that there are a number of topics and issues that are not included in this document which should be. We have been working nationally on a vision for the countryside which will be released in May that should be useful as part of the GDF consultation process.</p> <ul style="list-style-type: none"> • Surrey University – more information • proposals at cathedral site – more information • more detail of proposals for SARP and Woodbridge meadows • Should include analysis of 'school run' congestion areas and try to find ways of minimising there impact • Concern about ribbon development along the road between Guildford and Godalming and similar urban sprawl. Does the Peasmarsh business estate take account of the Wey riverside policy? • Guildford Borough Council owns a great deal of land and property. It would seem to CPRE that information on this should be in the public domain. What is the policy governing this portfolio? <p>Concerned about the SHMA</p> <ul style="list-style-type: none"> • No further review of green belt land using data from the SHLAA and GBCS should be undertaken until these documents have been finally published to prevent large scale green belt loss. • The issues of "windfall sites" and development phasing are not explored in any detail. • There is no reference to the impact of MOD plans for land in Surrey and in neighbouring areas over the next 20 years. Proposals for change at Aldershot, Deepcut, and Borden will have a spin-off effect on Guildford. • Issues relating to mineral extraction (Eashing), oil and gas (Albury and Tongham), and waste facilities subsequent to the Capel decision have been omitted (Ripley, Slyfield, Wisley). A reference should be made to the closure of the Albury landfill pit which should have a favourable impact on both the rural environment and traffic. • There is no definition provided as to what exactly is meant by Guildford being a "centre of significant change". • There is no reference to aviation and its quality of life effect on the town.
	(d.)	Crownhall Estates	<p>Whilst your SHLAA and Employment Study are awaited opportunities have been missed within the emerging document:-</p> <ol style="list-style-type: none"> a) Not all employment land is appropriately located; some could be used for other purposes. b) Some employment sites could be 'mixed use' and mixed tenure. c) You underestimate the current depression and impact specifically with regard to flatted development; no banks will fund these types of projects. d) Development has been a catalyst for change; by imposing the high affordable tariffs you are limiting who can afford to develop e) You need to place greater emphasis upon the provision of housing; this can only be achieved by careful release on the edge of settlements; you will encounter less opposition to the tariff structure you are seeking to impose and you won't despoil the character of Guildford Borough.
	(d.)	Downsedge Residents' Association	<p>We have not had time to analyse thoroughly the terms in the Glossary, but we are not happy with the definitions of "Housing demand" and "Housing need".</p>

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

Section	Issues	Respondent	Comments
	(d.)	English Heritage	The Key Diagram and suggests that the essential features of the environment are illustrated on it. It is accepted that this is a diagrammatic representation of the spatial strategy and that the scale precludes showing all key features, but this should be made clear. For example, key diagrams elsewhere have been able to show registered historic parks and gardens, conservation areas etc. A large proportion of the page is given over to areas outside the Borough and the legend, and so a redesign may allow more space to cover additional key spatial policy matters.
	(d.)	Environment Agency	Would like to see the glossary include a definition of green infrastructure, as the Core Strategy indicates this is relating to open space.
	(d.)	Environment Agency	The Key Diagram does not show flood risk which is a key consideration for the Borough.
	(d.)	Guildford Business Forum	GBF considers that the key diagram does not adequately recognise the potential for green belt review to release land for new development to meet Guildford's needs.
	(d.)	Guildford Society	General – Transport of goods. In background data, emphasis is placed on the expected increase in e-shopping and home delivery but this creates a plethora of “white vans” from different companies, each covering the whole area. Bristol & Norwich have created “consolidation centres” from which deliveries are made by individual vans to each area at off-peak times when domestic customers are most likely to be at home. Hence fewer white van miles. This has been previously highlighted by CFS (Surrey Ad. 17.10.08) This concept should be inserted at an appropriate location in the Core Strategy
	(d.)	John Moore Trust	Annex II – Glossary, add a definition for “Countryside Beyond the Green Belt”
	(d.)	John Moore Trust	Key Diagram should show clearly the Blackwater Valley Strategic Open Gap and show the 400m, 2km and 5km boundaries to the Thames Basin Heaths special protection areas
	(d.)	Member of the public	Look at improving the traffic flow at the Surrey Research Park. Ideally another exit should be added. This could either be a hospital only exit, diverting that traffic, or a general additional research park exit.
	(d.)	Member of the public	Key Diagram Page 26 The North part of West Horsley Settlement appears to be part of East Horsley. Suggest a scale is included.
	(d.)	Member of the public	High Street is closed to traffic most of the day and should not be shown as a through A Class Road. Dotted line?
	(d.)	Member of the public	The word 'Allotments' features only once in the Core Strategy. Allotments are vastly under supplied in the borough. Allotments provide open space, opportunities for residents to improve their health through exercise & healthy eating, reduce their carbon footprint. Allotments should be given a higher profile in the Core Strategy
	(d.)	Member of the public	The document runs to 134 pages and the preparation stage is scheduled to take 6 years (diagram 1). It beggars belief that a 'core strategy' can run on and on. The point of a strategy is to consolidate the councils thinking to what really matters and must be done. The strategy should establish the vital objectives for a sustainable future and set priorities. As said on page 2 the strategy must get the balance of economic, social and environmental needs right. Note that economic and social considerations are fundamental to decisions; environmental issues may affect that decision. Such a strategy is impractical and cannot be implemented.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
WEB SUMMARIES

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	(d.)	National Trust	The Trust does not consider that the value and importance of the River Wey and Navigations is sufficiently well recognised in the Core Strategy as a whole. The River Wey (rather than the Navigations) is referred to in different ways in the Area Visions. Whilst we welcome the references we do not believe they are adequate or comprehensive or reflect the strategic importance of the waterway in the Borough. Its importance has become more pertinent in the light of Policy CC8 of the South East Plan – Green Infrastructure, which refers to the need for the creation and protection of networks of multifunctional greenspace particularly within ‘Regional Hubs’ such as Guildford. Whilst we note that saved Policy G11 of the Local Plan, which deals with the protection of the Corridor of the River Wey, will not be superseded by the Core Strategy we propose that, in recognition of the strategic significance of the waterway within the borough as a whole, the Core Strategy includes this policy and accompanying supporting text, making reference to the Proposals Map for delineation of the Corridor.
	(d.)	RSPB	We feel that the Key diagram is too small to represent all the relevant information in a clear and concise way. We suggest that separate maps could be used to present strategic development, designated conservation areas (SPA, SAC, and SSSI), and other requirements of the Core Strategy such as strategic gaps or biodiversity restoration sites.
	(d.)	Send Parish Council	The consultation document presentation was somewhat confusing to respond to, therefore it may be useful to re-evaluate organisation of any further documents for consultation.
	(d.)	Solum Regeneration Partnership	We consider that the Council should embrace the strategic importance and opportunity provided by land at Guildford station and provide a suitably flexible, site specific allocation in the Core Strategy
	(d.)	Surrey County Council	We note that a number of evidence base documents have yet to be completed, including the Guildford Transport Statement, which we would view as instrumental to the Core Strategy. The status of Guildford as a Regional Hub is confirmed. The general premise for the Borough is one of significant growth. We are aware that the Borough Council also registered objections to the Proposed Changes, including a requirement for long-term housing provision within the Borough to remain at the level proposed within the draft Plan. The South-East Plan has yet to be formally adopted by the Secretary of State.
	(d.)	Terence O'Rourke on behalf of Wharf Land Investments (Jersey) Ltd.	A new policy should be created in relation the rural economy which includes the text: “Development of suitable previously developed Green Belt sites, where very special circumstances can be proven to exist, will assist in the support and revitalisation of the rural economy” The following wording should be included in a new policy relating to education: “We envisage a borough where educational excellence at all levels is maintained through supporting the land use requirements of educational establishments on urban and Green Belt sites, presuming very special circumstances can be proven to exist in the latter instance, which warrant development occurring.”
	(d.)	The Theatres Trust	Page numbers on the contents page would be useful please.
	(d.)	Vail Williams	We are surprised about the limited references to green belt policy in the core strategy. In particular, the document does not appear to be flexible enough to allow for a limited green belt release to meet the need for additional housing and employment land where it has been identified. We request that policies CP1 and CP3 need to allow for the relocation of green belt land on the edge of slyfield.

CORE STRATEGY FURTHER OPTIONS CONSULTATION RESPONSES
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Section	Issues	Respondent	Comments
	(d.)	Vail Williams	Having reviewed the document it is clear that integral documents such as the SHLAA, ELR, Infrastructure Study is not yet publically available or even completed, yet the related draft policies have already been written. We note the councils aim to have the evidence base in place by summer 2009 to "feed into the pre-submission document" at which point it will be far too late to change the seemingly agreed policy direction irrespective of what this outstanding evidence may identify. Thus the whole document appears fundamentally unsound.
	(d.)	Westborough, Broadacres & District Residents Association	(1) it is not an easy document to read & understand (2) the online reporting method is far too complex and enormously time consuming (3) too many terms are undefined (eg Affordable Home, Town Centre etc) (4) there are serious flaws in the data on which certain key assumptions are based
	(d.)	Woolf Bond Planning on behalf Martin Grant Homes Ltd	<ul style="list-style-type: none"> • There is now a need for a further review of the Green Belt over a different time scale (the next 20 years) which better reflects changing patterns of land use and demand. • Boundaries drawn in the 1960's now were never set for life and they now need to be reviewed on par with suggestions in the SE plan. • Boundaries are excessively tight around urban areas in accordance with PPG2. • We consider that a Green Belt release at Guildford is needed to support the anticipated levels of growth to be accommodated in Borough both in meeting the current Structure Plan housing needs to 2016 and as part of future needs in meeting South East Plan housing.
	(e.)	Jencar Engineering	This is a very tiring document to read. It needed a decent spell and grammar check before being issued. There are numerous errors eg pro-active twice, and proactive 7 times. The document is repetitive, far too long and full of buzzwords such as 'vibrant', 'dynamic', and do we really need the word 'biodiversity 55 times in 138 pages. Some of the proposals put forward in this document relating to car use and parking will spell the end of Guildford as a shopping centre. In many places in this document abbreviations such as dph or ha are used before (and sometimes never)giving the meaning of the abbreviation.
	(e.)	Member of the public	Correction: Page 3: states that the Government's increased housing requirement for Guildford Borough is 24% over that of the draft SE Plan of March 2006. Guildford had projected a target of 322 houses a year. The Secretary of State arbitrarily increased this by 100 a year. 100 is 31% of 322, not 24% as your document states.I suggest that these mathematical errors should be corrected immediately rather than leaving the correction until the final document is produced, since they may materially affect the understanding of the Strategy that is under consultation.