

Comments from (organisation, or surname).....

**Section B**

|  |                   |
|--|-------------------|
| Support / oppose/ comment (please specify)   | <b>OPPOSE</b>     |
| Proposed Change Number (e.g. Chap 1 (01))  | <b>Chap 4 (6)</b> |
| Paragraph No. - for comments on Sustainability Appraisal/Habitats Regulation Assessment Report |                   |

**Section C**

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

**Regional Hubs – Oppose inclusion of major high density economic and housing growth in the purpose of all hubs.** Regional hubs were originally proposed primarily as a focus for transport investment and selected due to their accessibility. The role of regional hubs would be radically changed with the addition of two new proposed roles, namely being a focus for housing development and for economic activity. If the role of hubs is to change, a new selection process is required. Guildford is suitable as a transport hub but not as a focus for major high density economic expansion and housing growth (see reasons set out in D1). It is particularly inappropriate to identify Guildford as one of the regional hubs to undergo the most radical change and growth.  
**Either delete Guildford from the list of regional hubs (unsustainable for reasons set out below) or revert to the original role of hubs as a focus for transport.**  
**These comments also apply to proposed change Chapter 4 (7)**

**Section D1**

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

**Sustainable growth respects the constraints imposed by natural resources. In Guildford, sustainable upward or outward expansion is limited by the geography of a gap town.** The Surrey Hills Area of Outstanding Natural Beauty rises to east and west and requires the highest level of landscape protection. The flood plain of the River Wey runs through the town and extends to the north and south. Significant parts of the town lie within the 5km protection zone of the Surrey Heaths Special Protection Area, a European habitat to the NW that we are obliged to safeguard. Harming the character of the historic centre would damage an economic asset. Congestion on constricted roads would increase.

**The scale of housing proposed for a Guildford major regional hub could only be achieved by extending the town significantly (minimum 4,110 dwelling extension). Such an expanded Guildford regional hub would be so close to the proposed expanded Woking regional hub that the towns would increasingly be treated a merged entity.**  
**These comments also apply to proposed change Chapter 4 (7)**

**Section D2**

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

**Before the two proposed new roles for hubs insert “and, in regional hubs where it would be consistent with sustainable development to do so, by:” Exclude Guildford on this basis.**

Please ensure that you have written your name at the top of the page and any additional pages. Completed forms should be received in the Government Office for the South East by 5.00pm on Friday 24October 2008. Late responses will not be accepted.

Comments from (organisation, or surname).....

**Section B**

|  |                    |
|--|--------------------|
| Support / oppose/ comment (please specify)   | <b>OPPOSE</b>      |
| Proposed Change Number (e.g. Chap 1 (01))  | <b>Chap 4 (11)</b> |
| Paragraph No. - for comments on Sustainability Appraisal/Habitats Regulation Assessment Report |                    |

**Section C**

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

**Centres for Significant Change – Oppose the Role for Guildford.**  
**Guildford is a historic market town located in a gap in the North Downs, cut by the River Wey. The town is physically constrained by the river and the hills. The town centre cannot undergo “Significant Change” without destroying its historic character, which helps to underpin its economic success, and without unacceptable cramming and loss of urban quality.**  
**Little land in the centre of Guildford is undeveloped and most land with lower intensity use is undefended flood plain at significant risk of flooding. There was flooding in 1968 + 2000. These comments also apply to proposed change Chapter 13 (13)**

**Section D1**

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

**The draft SE Plan recognises that the so called “London Fringe”, in which Guildford lies, faces “environmental constraints” yet it does not take adequate account of these in proposing very significant, intensive redevelopment of Guildford which is particularly constrained.**

The draft Plan also acknowledges the need to respect the character and high quality landscapes of places like Guildford and its surrounding countryside. It states that these are an asset in economic terms. Yet it proposes high density redevelopment and expansion of the town centre that would harm this asset and add to infrastructure and congestion problems.

This designation would lead to high rise cramming of the town centre and relegation of its High Street to a peripheral role. There have been several recent plans for eight storey blocks of flats in the centre of Guildford. This policy would lead to wholesale redevelopment on this scale at the expense of the heritage and qualities that are so important to Guildford’s economy.  
**These comments also apply to proposed change Chapter 13 (13)**

**Section D2**

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

**Delete this new policy or delete Guildford from list of Centres for Significant Change.**

Please ensure that you have written your name at the top of the page and any additional pages. Completed forms should be received in the Government Office for the South East by 5.00pm on Friday 24October 2008. Late responses will not be accepted.

Comments from (organisation, or surname).....

**Section B**

|  |                   |
|--|-------------------|
| Support / oppose/ comment (please specify)   | <b>OPPOSE</b>     |
| Proposed Change Number (e.g. Chap 1 (01))  | <b>Chap 7 (4)</b> |
| Paragraph No. - for comments on Sustainability Appraisal/Habitats Regulation Assessment Report |                   |

**Section C**

To help us process your response effectively, please summarise why you support or oppose the Proposed Change:

**Oppose the requirement for a minimum of 8,440 additional dwellings in Guildford Borough of which 7,940 would be in the town. Development on this scale, largely to tackle overspill from London, would involve loss of urban quality and require major development in the Green Belt. It is noted with concern that not only is the Green Belt to be reviewed to accommodate 2,000 new homes but also provision for a *further* 2,110 dwellings is required by Chapter 4 (14). In considering the impact of expansion on this scale, the proposal that Woking may expand onto the Green Belt between Guilford and Woking also needs to be taken into account. This amounts to a requirement to plan for a minimum of 10,050 new dwellings in Guilford town. This would be totally unsustainable.**

Guildford cannot accommodate 8,000 new homes, let alone 10,000, without harm. SEERA recommended some 6,000 based on capacity studies and even that level may have required Green Belt expansion. This target has been increased despite recognition by the Inspectors of the limits to growth in Guildford as a result of topography, narrow streets and being surrounded by Green Belt and AONB. They acknowledged the risk of “town cramming and loss of urban quality”. Furthermore, Guildford could not cope with the traffic and parking from so many new dwellings.

**A flood plain runs through the town, and internationally rare heathland to the north-west must be protected from the pressures of development through the European Habitats Directive. To meet development targets, significant housing would need to be built within the 5km protection zone. The Sustainability Appraisal advises that there should be no increase in housing targets within this zone for five years to ensure existing protection measure are working. The growth target should be reduced to recognise this. These comments also apply to proposed change Chapter 20 (6)**

**Section D1**

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

**Section D2**

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

**Delete “minimum”. Revise Guildford target to sustainable level.**

Please ensure that you have written your name at the top of the page and any additional pages. Completed forms should be received in the Government Office for the South East by 5.00pm on Friday 24October 2008. Late responses will not be accepted.

Comments from (organisation, or surname).....

**Section B**

|  |                    |
|--|--------------------|
| Support / oppose/ comment (please specify)   | <b>OPPOSE</b>      |
| Proposed Change Number (e.g. Chap 1 (01))  | <b>Chap 4 (14)</b> |
| Paragraph No. - for comments on Sustainability Appraisal/Habitats Regulation Assessment Report |                    |

**Section C**

To help us process your response effectively, please summarise why you support or oppose the Proposed Change:

**Welcome the recognition there is a strong need for the region’s Green Belt but strongly oppose the requirement to review the Green Belt around Guildford to allow for 2,000 plus 2,110 homes and to allow for further development on the Guildford side of Woking. To build an estate of 4,110 homes on the edge of Guildford beyond Burpham and Merrow would distort the town and cause sprawl and unacceptable traffic problems in an already congested town.**

**Also, in view of the proposal in Chapter 5 (30) to scrap “Strategic Gaps”, it is essential to reinforce the vital role Green Belt plays in preventing towns from coalescing and in maintaining their separate identities. The “Strategic Gap” between Guilford and Woking has played a crucial role in preventing the towns from merging and in protecting the quality of the land between. If a review of Green Belt around these towns is proposed, it is vital that there is clear guidance in policy 4 (14) on the role of Green Belt in securing effective “Strategic Gaps” between such settlements. This is particularly important given the intention to build in Green Belt on the Woking side of Guildford and on the Guildford side of Woking.**

**These comments also apply to proposed change Chapter 20 (11)**

**Section D1**

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

**The Secretary of Sate comments in 4 (14) that Green Belt prevents urban sprawl by keeping land permanently open, checks the unrestricted sprawl of large built-up areas and prevents neighbouring towns from merging into one another. It is essential that the Green Belt remains effective in fulfilling these roles around Guildford.**

**Section D2**

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

**After “supported” insert “. Its role in preventing settlements from coalescing and in avoiding sprawl around London is of particular significance in this region.” delete [and] insert “The...”**

Please ensure that you have written your name at the top of the page and any additional pages. Completed forms should be received in the Government Office for the South East by 5.00pm on Friday 24October 2008. Late responses will not be accepted.